

# **EXHIBIT 10**

**DECLARATION OF MATTHEW E. SLOAN  
TO JINHUA'S OPPOSITION TO USA MIL 1**

**REVISED REDACTED VERSION  
PURSUANT TO ECF NO. 338 ORDER**



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# Transcript of Stephen Chen

**Date:** July 10, 2018

**Case:** Micron Technology, Inc. -v- United Microelectronics Corp., et al.

**Planet Depos**

**Phone:** 888.433.3767

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WORLDWIDE COURT REPORTING | INTERPRETATION | TRIAL SERVICES

USD-0351510

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

-----X

MICRON TECHNOLOGY, INC.,  
Plaintiff,

Case No.

v.

3:17-CV-06932-JSW

UNITED MICROELECTRONICS  
CORPORATION, FUJIAN JINHUA

INTEGRATED CIRCUIT CO.,

LTD., and DOES 1-10,

Defendants.

-----X

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Videotaped deposition of STEPHEN CHEN

Chen & Lin  
Bank Tower, 12th Floor  
205 Tunhwa North Road  
Taipei 105  
TAIWAN

TUESDAY, JULY 10, 2018

9:07 A.M.

Pages 1 - 114

Reported by Jade K. King.

USD-0351511

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Transcript of Stephen Chen

Conducted on July 10, 2018

2

1 Deposition of STEPHEN CHEN, held at:

2

3 Chen & Lin

4 Bank Tower, 12th Floor

5 205 Tunhwa North Road

6 Taipei 105

7 TAIWAN

8

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10

11

12 Pursuant to agreement, before Jade K. King.

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Transcript of Stephen Chen

Conducted on July 10, 2018

3

A P P E A R A N C E S

FOR MICRON TECHNOLOGY, INC.:

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FOR UNITED MICROELECTRONICS CORPORATION:

DAN JOHNSON

MARIO MOORE

DAN JOHNSON LAW GROUP

400 Oyster Point Blvd, Suite 321

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CA 94080

ALSO PRESENT:

Chester Wong (Videographer)

Chia-Ling Cheng (Main Interpreter)

Yugo Wang (Check Interpreter)

Lucas Chang (UMC in-house counsel)

Chia-Fang Lin (UMC in-house counsel)

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USD-0351513

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Conducted on July 10, 2018

4

1 (MR. STEPHEN CHEN, duly sworn. All .....6  
 2 answers to be given in English  
 3 from this point unless  
 4 otherwise indicated.)  
 5  
 6 EXAMINATION BY MR. MICHAEL: .....6  
 7  
 8 (Exhibit 31 marked for .....45  
 9 identification - Corporate  
 10 filing from UMC)  
 11  
 12 (Exhibit 32 marked for .....54  
 13 identification - Exhibit 4  
 14 previously filed in court  
 15 hearing)  
 16  
 17 (Exhibit 33 marked for .....56  
 18 identification - Exhibit C  
 19 previously filed in court  
 20 hearing)  
 21  
 22 (Exhibit 23, as previously marked - .....64  
 23 Document with Bates number  
 24 UMCCORPJD000001)  
 25  
 (Exhibit 30, as previously marked - .....66  
 Document with Bates numbers  
 UMCCORPJD000008 through 12)  
 (Exhibit 9, as previously marked - .....73  
 Document with Bates numbers  
 UMCCORPJD000017 through 30)  
 (Exhibit 29, as previously marked - .....79  
 Document with Bates numbers  
 UMCCORPJD000041 through 46)  
 EXAMINATION BY MR. JOHNSON: .....97  
 FURTHER EXAMINATION BY MR. MICHAEL: .....105

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Transcript of Stephen Chen

Conducted on July 10, 2018

5

1 P R O C E E D I N G S

2 THE VIDEOGRAPHER: Here begins media unit 09:07:33  
3 No. 1, videotaped deposition of Stephen Chen in 09:07:35  
4 the matter of Micron Technology Inc. versus United 09:07:39  
5 Microelectronics Corp et al. 09:07:44

6 Today's date is 10 July 2018. The time 09:07:45  
7 on the video monitor is 9:07 a.m. 09:07:48

8 The videographer today is Chester Wong on 09:07:53  
9 behalf of Planet Depos. This video deposition is 09:07:55  
10 taking place at Bank Tower, 12th floor, 205 Tunhwa 09:07:57  
11 North Road, Taipei. 09:08:03

12 The court reporter today is Jade King on 09:08:05  
13 behalf of Planet Depos. 09:08:07

14 Would counsel please voice-identify 09:08:08  
15 themselves and state whom they represent. 09:08:10

16 MR. MICHAEL: Patrick Michael with Jones 09:08:13  
17 Day on behalf of Micron. 09:08:14

18 MR. KAY: Good morning. Randy Kay from 09:08:17  
19 Jones Day, also for Micron. 09:08:18

20 MR. JOHNSON: I'm Daniel Johnson Junior 09:08:21  
21 from the Dan Johnson Law Group on behalf of UMC. 09:08:23

22 MR. MOORE: Mario Moore of the Dan 09:08:26  
23 Johnson Law Group on behalf of UMC. 09:08:27

24 THE VIDEOGRAPHER: Would the reporter 09:08:31  
25 please swear in the interpreters and the witness. 09:08:32

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USD-0351515

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Transcript of Stephen Chen

Conducted on July 10, 2018

6

1	THE COURT REPORTER: Before I take the	09:08:35
2	oaths, I would like the parties to stipulate they	09:08:35
3	understand the court reporter is not a notary	09:08:35
4	public in this venue and nevertheless stipulate	09:08:35
5	that the court reporter can administer the oaths,	09:08:35
6	and further agree that they will not object to the	09:08:35
7	admissibility of the transcript based on the	09:08:35
8	oaths.	09:08:35
9	Is that agreed by the parties?	09:08:35
10	MR. MICHAEL: Agreed on behalf of Micron.	09:08:52
11	MR. JOHNSON: Agreed on behalf of UMC.	09:08:54
12	(MS. CHIA-LING CHENG sworn as the main	09:08:56
13	interpreter)	09:08:56
14	(MR. YUGO WANG sworn as the check	09:08:56
15	interpreter)	09:08:56
16	(MR. STEPHEN CHEN, duly sworn. All	09:08:56
17	answers to be given in English from this point	09:08:56
18	unless otherwise indicated.)	09:08:56
19	EXAMINATION BY MR. MICHAEL:	09:08:56
20	Q. Good morning, Mr. Chen.	09:09:29
21	A. Good morning.	09:09:33
22	Q. Can you please state your full name for	09:09:34
23	the record.	09:09:36
24	A. Cheng-Kun Chen. Cheng-Kun Chen is my	09:09:38
25	Chinese name.	09:09:46

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Transcript of Stephen Chen

Conducted on July 10, 2018

7

1	Q. And what is your English name?	09:09:46
2	A. Stephen.	09:09:48
3	Q. Stephen Chen?	09:09:49
4	A. Chen.	09:09:50
5	Q. And what is your address?	09:09:52
6	[REDACTED]	09:09:56
7	[REDACTED]	09:10:07
8	Q. And how long have you lived at that	09:10:16
9	address?	09:10:18
10	A. Two and a half year.	09:10:23
11	Q. What was your address prior to your	09:10:24
12	current address?	09:10:27
13	A. (Chinese spoken). But the address, I	09:10:28
14	cannot --	09:10:28
15	A. (Through interpreter) I lived on --	09:10:33
16	A. (Chinese spoken).	09:10:33
17	THE MAIN INTERPRETER: Correction.	09:10:33
18	A. (Through interpreter) I lived on Chu Tsun	09:10:33
19	Seventh Road. But the exact address, I actually	09:10:33
20	do not recall.	09:10:52
21	BY MR. MICHAEL:	09:10:54
22	Q. Also in Hsinchu?	09:10:54
23	[REDACTED]	09:10:56
24	[REDACTED]	09:10:57
25	Q. And who is your employer?	09:11:00

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Transcript of Stephen Chen

Conducted on July 10, 2018

8

1	A. UMC now.	09:11:05
2	Q. And when you say "UMC", you mean United	09:11:08
3	Microelectronics Corporation; correct?	09:11:11
4	A. Yes.	09:11:12
5	Q. Have you ever had your deposition taken	09:11:17
6	before?	09:11:19
7	A. No.	09:11:24
8	Q. So during the course of the day, I'll be	09:11:25
9	asking you questions and you will be providing	09:11:27
10	answers, and what I'd ask is that you wait for me	09:11:29
11	to complete your question before you give your	09:11:35
12	answer, and likewise I'll try to wait for you to	09:11:38
13	answer before I ask my next question. Is that	09:11:41
14	fair?	09:11:44
15	A. Okay.	09:11:53
16	Q. And during the course of today's	09:11:54
17	deposition, you know a decent amount of English,	09:11:56
18	certainly much more Mandarin than I know, but	09:12:00
19	we'll be using a court -- an interpreter to assist	09:12:03
20	with the questions and the answers. Is that	09:12:06
21	acceptable to you?	09:12:08
22	A. Okay. Thank you. Okay. Thank you.	09:12:10
23	Q. And what I would ask is that if you don't	09:12:21
24	understand a question, that you ask me to clarify.	09:12:23
25	Otherwise, if you answer the question, I'm going	09:12:28

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Transcript of Stephen Chen

Conducted on July 10, 2018

9

1	to assume that you understood the question. Do	09:12:30
2	you understand that?	09:12:33
3	A. I understand. Okay.	09:12:35
4	Q. Other than in a deposition, have you ever	09:12:47
5	provided testimony before in any other proceeding?	09:12:50
6	A. In Taiwan?	09:13:01
7	Q. Anywhere.	09:13:03
8	A. Taiwan. Only Taiwan.	09:13:04
9	Q. In Taiwan, you have? And what was that	09:13:06
10	matter relating to?	09:13:08
11	A. It's for this Micron case, because there	09:13:15
12	is an investigation last February. I was also	09:13:17
13	witness for this case -- for this case in Taiwan.	09:13:21
14	Q. And who did you provide testimony in	09:13:26
15	front of?	09:13:28
16	A. (Through interpreter) It was	09:13:36
17	an investigation station at Banqiao.	09:13:37
18	THE MAIN INTERPRETER: Interpreter	09:13:45
19	spelling, B-a-n-q-i-a-o.	09:13:45
20	BY MR. MICHAEL:	09:13:49
21	Q. And on how many occasions did you provide	09:13:50
22	testimony?	09:13:52
23	A. Only one time.	09:13:53
24	Q. And was the testimony -- was it recorded	09:13:55
25	by way of an audio recording or a stenographer?	09:14:00

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Transcript of Stephen Chen

Conducted on July 10, 2018

10

1	A. (Through interpreter) I assume there was	09:14:15
2	an audio and video recording kept at the	09:14:22
3	investigation department.	09:14:24
4	Q. But you don't know for sure one way or	09:14:26
5	the other?	09:14:28
6	A. Yeah, I don't see the camera.	09:14:31
7	Q. Do you recall the date of that testimony?	09:14:34
8	A. February 14.	09:14:42
9	Q. February 14, two-thousand-and --	09:14:50
10	A. '17.	09:14:57
11	Q. -- seventeen. Okay.	09:15:01
12	Other than the testimony that you	09:15:01
13	provided on February 14th, 2017, have you provided	09:15:02
14	testimony in any other matters?	09:15:06
15	A. I work for Powerchip before, and also	09:15:18
16	I was a witness for one case when I work for	09:15:24
17	Powerchip. It's maybe 2007.	09:15:27
18	Q. Was that an intellectual property	09:15:36
19	dispute?	09:15:38
20	A. That's our chairman of the Powerchip have	09:15:42
21	some kind of inside trade issue, inside trade.	09:15:44
22	I was a witness.	09:15:49
23	Q. Okay. And did you testify in court, or	09:15:52
24	was it in a deposition? Do you recall?	09:15:54
25	A. (Through interpreter) Deposition. It was	09:15:59

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Transcript of Stephen Chen

Conducted on July 10, 2018

11

1 a deposition.

09:16:03

2 Q. Okay. And that was here in Taiwan;

09:16:05

3 correct?

09:16:08

4 A. Yeah. Because at that time it's -- yeah,  
5 in Taiwan.

09:16:09

09:16:12

6 Q. In connection with today's deposition,  
7 can you tell me generally what you've done to  
8 prepare yourself to come here today and provide  
9 testimony?

09:16:13

09:16:17

09:16:19

09:16:22

10 A. I have the -- because we have some  
11 interview with our lawyer, only for half-day,  
12 yeah. That's all.

09:16:35

09:16:38

09:16:42

13 Q. And your lawyer, referring to  
14 Mr. Johnson?

09:16:43

09:16:46

15 A. No, Mario.

09:16:49

16 Q. Oh, Mario. Mr. Chen, I don't want you to  
17 disclose to me the content of your conversations  
18 with your lawyers, so I'm just going to ask you  
19 a couple of questions.

09:16:50

09:16:57

09:16:59

09:17:02

20 On how many occasions did you have to  
21 meet with attorneys to prepare for today's  
22 deposition?

09:17:03

09:17:05

09:17:08

23 A. Last week, twice.

09:17:28

24 Q. And the first meeting, what day was that?

09:17:32

25 A. Last -- last Monday. And Wednesday.

09:17:47

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Transcript of Stephen Chen

Conducted on July 10, 2018

12

1	Q. Monday and Wednesday of last week, you	09:17:52
2	had meetings; correct?	09:17:54
3	A. Yeah.	09:18:00
4	Q. And the Monday meeting, how long was the	09:18:00
5	Monday meeting?	09:18:02
6	A. Maybe four or five hours, but we also	09:18:10
7	break for, for, for lunch.	09:18:12
8	Q. And who was present at that meeting?	09:18:16
9	A. Three. Mario, Lucas and Chia-Fang Lin.	09:18:30
10	(Court reporter clarification)	09:18:54
11	Q. And during the course of that meeting,	09:18:55
12	did you review documents?	09:18:57
13	A. No.	09:19:00
14	Q. On the Wednesday meeting, who did you	09:19:09
15	meet with?	09:19:11
16	A. Mario and Chia-Fang only.	09:19:14
17	Q. And how long was that meeting?	09:19:16
18	A. Maybe less -- almost two hour.	09:19:21
19	Q. And did you review documents during the	09:19:24
20	Wednesday meeting?	09:19:27
21	A. No.	09:19:31
22	Q. In preparing for your deposition here	09:19:34
23	today, did you make any effort to collect or	09:19:37
24	identify documents?	09:19:41
25	A. No. Basically, no.	09:19:54

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Transcript of Stephen Chen

Conducted on July 10, 2018

13

1	Q. Have you had any involvement in	09:19:57
2	collecting documents in order for UMC to produce	09:20:00
3	documents to Micron in this litigation?	09:20:06
4	A. No.	09:20:19
5	Q. Has anybody asked you to provide to them	09:20:28
6	documents related to this litigation?	09:20:32
7	A. No.	09:20:42
8	Last week, the --	09:20:56
9	MR. JOHNSON: No question is pending.	09:20:57
10	A. Okay.	09:20:59
11	MR. JOHNSON: If you need to take	09:21:01
12	a break, we can take a break, but no question's	09:21:02
13	pending.	09:21:04
14	BY MR. MICHAEL:	09:21:08
15	Q. I want to make sure that I understand	09:21:08
16	your testimony, Mr. Chen. Is it correct that you	09:21:10
17	have made no efforts to identify or collect	09:21:14
18	documents for UMC in connection with this	09:21:18
19	litigation?	09:21:21
20	A. Yes.	09:21:45
21	Q. To your knowledge, does UMC have	09:22:02
22	possession of Micron technical documents relating	09:22:05
23	to DRAM technology?	09:22:08
24	A. I have no idea.	09:22:19
25	Q. To your knowledge, has UMC ever had	09:22:26

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Transcript of Stephen Chen

Conducted on July 10, 2018

14

1	possession of Micron technical documents relating	09:22:44
2	to DRAM technology?	09:22:47
3	A. No.	09:22:58
4	Q. To your knowledge, has UMC or any of its	09:23:05
5	employees ever deleted or destroyed Micron	09:23:08
6	technical documents related to DRAM technology?	09:23:13
7	A. I have no idea.	09:23:30
8	Q. You understand when I ask questions	09:23:50
9	relating to Micron documents, I'm including	09:23:52
10	electronic documents that may be stored on	09:23:56
11	laptops, USB drives, or other storage media?	09:23:59
12	A. I understand.	09:24:28
13	Q. And so we're clear, to your knowledge,	09:24:28
14	UMC does not have and never has possessed Micron	09:24:33
15	technical documents relating to DRAM technology,	09:24:38
16	whether they're hard-copy documents or electronic	09:24:43
17	documents on storage media?	09:24:46
18	MR. JOHNSON: Objection. Question's	09:24:47
19	compound.	09:24:48
20	A. Yes.	09:25:11
21	BY MR. MICHAEL:	09:25:13
22	Q. I'm going to break the question up based	09:25:13
23	on counsel's objection. It's a fair objection.	09:25:16
24	To your knowledge, has UMC ever	09:25:28
25	possessed laptops containing Micron technical	09:25:30

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Transcript of Stephen Chen

Conducted on July 10, 2018

15

1	documents on DRAM technology?	09:25:35
2	A. No.	09:25:48
3	Q. To your knowledge, has UMC ever possessed	09:25:52
4	USB drives containing Micron technical documents	09:25:56
5	on DRAM technology?	09:25:59
6	A. No.	09:26:13
7	Q. And to your knowledge, has UMC ever	09:26:14
8	possessed any other electronic storage media that	09:26:17
9	contains Micron technical documents on DRAM	09:26:22
10	technology?	09:26:25
11	A. No.	09:26:36
12	Q. What's your date of birth, Mr. Chen?	09:26:40
13	A. November 12th.	09:26:44
14	Q. What year?	09:26:46
15	A. 1962.	09:26:48
16	Q. And where were you born?	09:26:50
17	A. Kaohsiung, south of Taiwan.	09:26:53
18	Q. I'm not understanding "south of Taiwan".	09:27:05
19	Where is that?	09:27:08
20	A. It's -- the city is -- Taipei --	09:27:10
21	Kaohsiung is south of Taiwan, and Taipei is	09:27:15
22	located the north of Taiwan.	09:27:25
23	Q. Okay.	09:27:26
24	A. The city name -- city named Kaohsiung.	09:27:26
25	Q. And it's south of Taipei?	09:27:26

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Transcript of Stephen Chen

Conducted on July 10, 2018

16

1	A. Yeah, south of the whole island.	09:27:26
2	Q. On the southern part of Taiwan?	09:27:29
3	A. Yes.	09:27:32
4	Q. Understood. And your citizenship?	09:27:33
5	A. Taiwan only.	09:27:36
6	Q. Have you ever been to the United States?	09:27:41
7	A. Yes. Many times.	09:27:44
8	Q. In what capacity have you been to the	09:27:50
9	United States?	09:27:54
10	A. Business trip. And also see a friend	09:27:55
11	there.	09:28:01
12	Q. And approximately how many times have you	09:28:04
13	been to the United States?	09:28:06
14	A. I think more than 10 times total.	09:28:15
15	Q. And can you roughly break down who your	09:28:23
16	employers were for those 10 business trips?	09:28:26
17	MR. JOHNSON: Counsel, can we get some	09:28:36
18	date timeframes for these trips?	09:28:37
19	MR. MICHAEL: Yeah.	09:28:43
20	MR. JOHNSON: It might make the record	09:28:44
21	more clear.	09:28:45
22	A. My -- I work for TI-Acer in Taiwan. We	09:28:48
23	had technology cooperation with Texas Instruments.	09:28:53
24	Back to 19 -- maybe 1989 or '90. Yeah, I had the	09:28:58
25	trip --	09:29:04

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Transcript of Stephen Chen

Conducted on July 10, 2018

17

1	THE COURT REPORTER: Sorry, did you say	09:29:04
2	"TIS" with Texas Instruments?	09:29:04
3	A. That's a joint venture, TI with -- Texas	09:29:04
4	Instruments with Taiwan computer company Acer.	09:29:10
5	THE COURT REPORTER: Is it "TI"?	09:29:10
6	MR. JOHNSON: TI-Acer.	09:29:10
7	A. Acer. Then I have ...	09:29:10
8	BY MR. MICHAEL:	09:29:24
9	Q. Real quick, Mr. Chen. So you worked for	09:29:24
10	a company that involved a joint venture between	09:29:25
11	Texas Instruments and Acer; is that correct?	09:29:28
12	A. Yes.	09:29:31
13	Q. And did you travel to the United States	09:29:37
14	as part of your employment at that time?	09:29:40
15	A. Yes.	09:29:48
16	Q. And what was that time period?	09:29:50
17	A. 1989 to 1991. That timeframe.	09:29:55
18	Q. Let's see if we can break this down	09:30:01
19	a little, a little closer. Since you've been	09:30:03
20	employed with UMC, have you made business trips to	09:30:05
21	the United States?	09:30:09
22	A. Yes, two years ago.	09:30:22
23	Q. You've made only one trip to the United	09:30:25
24	States in your business role with UMC?	09:30:27
25	A. That's -- I joined job fair activity with	09:30:40

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Transcript of Stephen Chen

Conducted on July 10, 2018

18

1	Jinhua. That's the only one trip.	09:30:45
2	Q. And you're referring to a trip in October	09:30:47
3	2016?	09:30:49
4	A. Yes.	09:30:55
5	Q. While you worked with Micron, did you	09:31:01
6	make any business trips to the United States?	09:31:04
7	A. Yes.	09:31:12
8	Q. How many times?	09:31:13
9	A. Two times, I remember.	09:31:16
10	Q. And where did you go on these business	09:31:20
11	trips in the United States?	09:31:23
12	A. I flew to the San Francisco and then	09:31:32
13	transferred to the Boise. That's the trip.	09:31:35
14	Q. Okay. Both occasions, you flew through	09:31:41
15	San Francisco to Boise, Idaho?	09:31:43
16	A. Yes. Because there is no direct flight	09:31:50
17	to the Idaho.	09:31:52
18	Q. You're lucky you found one from San	09:31:55
19	Francisco.	09:31:58
20	Did you visit Micron's northern	09:32:01
21	California facility on either of those trips?	09:32:04
22	A. No.	09:32:18
23	Q. You only visited Micron's headquarters in	09:32:18
24	Boise, Idaho; is that correct?	09:32:22
25	A. Yes. Yes.	09:32:24

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Transcript of Stephen Chen

Conducted on July 10, 2018

19

1	Q. Do you recall approximately the dates of	09:32:28
2	those business trips?	09:32:31
3	A. I only remember roughly end of June. End	09:32:38
4	of June. Always we had a meeting yearly at -- by	09:32:44
5	end of June. At Boise, yeah. In Boise.	09:32:51
6	Q. Okay. And what years approximately would	09:32:56
7	these have been, if you recall?	09:32:59
8	A. 2014 and 2015.	09:33:07
9	Q. And during the course of these meetings,	09:33:16
10	did you visit Micron's fabrication facilities in	09:33:18
11	Boise, Idaho?	09:33:24
12	A. No.	09:33:35
13	Q. You're aware that Micron has fabrication	09:33:36
14	facilities in Idaho; correct?	09:33:38
15	A. Yes, I know.	09:33:46
16	Q. And you're aware that Micron has	09:33:47
17	a fabrication facility they refer to as "Fab 4",	09:33:49
18	which is located in Idaho; correct?	09:33:53
19	A. I know.	09:34:04
20	Q. Mr. Chen, why don't you provide for me	09:34:17
21	your educational background after high school.	09:34:19
22	A. I graduated from the Chengkung	09:34:29
23	University, then entered the Tsinghua University	09:34:31
24	for master's degree. That's all.	09:34:40
25	Q. What year did you graduate from -- is it	09:34:45

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Transcript of Stephen Chen

Conducted on July 10, 2018

20

1	Tsingkeng [sic] University?	09:34:49
2	A. Chengkung.	09:34:49
3	Q. Chengkung. What year did you graduate	09:34:51
4	from Chengkung University?	09:34:54
5	A. 1985.	09:34:59
6	Q. And what was your degree?	09:35:00
7	A. Bachelor degree.	09:35:02
8	Q. Was it a bachelor degree in electrical	09:35:04
9	engineering?	09:35:08
10	A. Material science.	09:35:10
11	THE COURT REPORTER: Material science?	09:35:13
12	A. Material science and metallurgy.	09:35:13
13	BY MR. MICHAEL:	09:35:15
14	Q. And then you proceeded to enter a program	09:35:17
15	for your master's degree. Did you complete your	09:35:21
16	master's?	09:35:30
17	A. Yes.	09:35:30
18	Q. And what year did you get your master's?	09:35:31
19	A. 1987.	09:35:34
20	Q. And what was your master's degree in?	09:35:35
21	Was it also in material science and --	09:35:38
22	A. Material science.	09:35:41
23	Q. Did you do a thesis as part of your	09:35:47
24	master's program?	09:35:50
25	A. Yes.	09:35:51

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Transcript of Stephen Chen

Conducted on July 10, 2018

21

1	Q. And did you publish?	09:35:52
2	A. Suppose.	09:35:56
3	Q. But what was the topic of your thesis?	09:35:59
4	A. I remember very clearly. Copper sputter.	09:36:05
5	THE COURT REPORTER: Could you say again.	09:36:12
6	A. Copper.	09:36:12
7	BY MR. MICHAEL:	09:36:12
8	Q. Copper?	09:36:12
9	A. Copper. The copper process for the	09:36:12
10	copper technology of semiconductor, but at that	09:36:14
11	time, I -- my -- it says on the cover	09:36:17
12	"sputtering".	09:36:20
13	MR. JOHNSON: Sputtering?	09:36:21
14	A. Yeah.	09:36:21
15	MR. JOHNSON: Sputter.	09:36:21
16	A. Yeah, I set up the equipment by myself	09:36:21
17	for this process. So that's why I start my career	09:36:25
18	in semiconductor.	09:36:31
19	MR. JOHNSON: Sputtering.	09:36:35
20	BY MR. MICHAEL:	09:36:39
21	Q. Would you say that most of your	09:36:40
22	experience in the semiconductor industry is on the	09:36:43
23	equipment side as opposed to the software design	09:36:45
24	side?	09:36:48
25	A. Process technology.	09:36:58

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Transcript of Stephen Chen

Conducted on July 10, 2018

22

1	Q. Process technology. And when you say	09:37:03
2	"process technology", what does that mean?	09:37:05
3	A. I was the manager of the process	09:37:11
4	integration.	09:37:13
5	Q. What does -- what does "process	09:37:18
6	integration" mean?	09:37:22
7	A. It's the -- with the technology, we need	09:37:25
8	to have many -- four steps taken integration, the	09:37:29
9	integration team is integrate all the unit process	09:37:37
10	into one floor in kind of a row and discuss with	09:37:39
11	the model for improvement. That's back to 20	09:37:43
12	years ago.	09:37:50
13	Q. And after you obtained your master's	09:37:54
14	degree, did you go on for any additional	09:37:56
15	postgraduate studies?	09:37:58
16	A. No.	09:38:05
17	Q. Do you have any patents in your name	09:38:06
18	where you're the named inventor?	09:38:09
19	A. I cannot remember. Because I was	09:38:16
20	a manager very early, when I worked for --	09:38:22
21	I become a manager after I work for five years.	09:38:27
22	So basically I, I, I have not do the detail of the	09:38:30
23	technology development or process, yeah.	09:38:34
24	Q. Okay. Why don't we start with your first	09:38:40
25	job out of -- after you obtained your master's	09:38:47

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Transcript of Stephen Chen

Conducted on July 10, 2018

23

1	degree. What was your first job in the	09:38:49
2	semiconductor industry?	09:38:51
3	A. I work for one design company who is the	09:38:58
4	fabless design company, and I was the product	09:39:06
5	testing engineer.	09:39:11
6	Q. What was the name of that company?	09:39:15
7	A. SIS, Silicon Integration and something.	09:39:20
8	SIS.	09:39:26
9	Q. And what were the years that you were	09:39:27
10	employed with SIS?	09:39:29
11	A. 1989, because after I graduate from	09:39:37
12	master's degree, I have two years for military	09:39:39
13	service.	09:39:43
14	Q. Oh.	09:39:44
15	A. 1989, that's my first job, yeah.	09:39:47
16	Q. You served in the military in Taiwan?	09:39:50
17	A. Yes.	09:39:54
18	Q. What part of the military?	09:39:55
19	A. Army.	09:39:58
20	Q. And how long were you employed at SIS?	09:40:08
21	1989 until when?	09:40:12
22	A. (Through interpreter) The end of 1990.	09:40:19
23	A. Then I joined TI-Acer. I maybe left 1990	09:40:24
24	or 1991, yeah.	09:40:31
25	Q. And the name of the joint venture was	09:40:34

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Transcript of Stephen Chen

Conducted on July 10, 2018

24

1	TI-Acer, yeah.	09:40:37
2	A. Also DRAM company.	09:40:40
3	Q. Was the fabless design company, SIS, was	09:40:43
4	that a DRAM company?	09:40:49
5	A. No.	09:40:50
6	Q. Logic?	09:40:54
7	A. Logic and also memory. Memory for mask	09:40:55
8	ROM and S-RAM. Mask ROM. I was the engineer for	09:40:57
9	mask ROM.	09:41:04
10	THE COURT REPORTER: Could you say that	09:41:23
11	term again.	09:41:23
12	A. Mask, mask is a -- it's one kind of	09:41:23
13	memory.	09:41:23
14	THE COURT REPORTER: I just need the	09:41:23
15	word, not the explanation.	09:41:23
16	A. Mask, m-a-s-k.	09:41:23
17	THE COURT REPORTER: Thank you. And the	09:41:23
18	second part? Mask --	09:41:23
19	A. Memory, Mask ROM. R-O-M. Read only	09:41:23
20	memory.	09:41:23
21	THE COURT REPORTER: Thank you.	09:41:23
22	BY MR. MICHAEL:	09:41:23
23	Q. So TI-Acer was your first DRAM company;	09:41:25
24	is that correct?	09:41:29
25	A. Yes.	09:41:35

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Transcript of Stephen Chen

Conducted on July 10, 2018

25

1	Q. And what were the years that you were	09:41:35
2	employed at TI-Acer?	09:41:37
3	A. I worked with TI-Acer maybe three years	09:41:47
4	only, two or -- two or -- three year, roughly.	09:41:51
5	Q. So 1991 to 1994?	09:41:58
6	A. Yeah.	09:42:00
7	Q. And what was your position at TI-Acer?	09:42:00
8	A. Senior engineer and take care of the	09:42:06
9	failure analysis laboratory.	09:42:10
10	Q. Can you give me that testimony again?	09:42:14
11	You were the senior engineer and you took care of	09:42:19
12	what laboratory?	09:42:22
13	A. Failure analysis.	09:42:32
14	THE MAIN INTERPRETER: "Failure".	09:42:35
15	A. If there are any failures, send to my lab	09:42:35
16	and I do analysis for them.	09:42:38
17	BY MR. MICHAEL:	09:42:39
18	Q. And after TI-Acer, what was your next	09:42:50
19	job?	09:42:53
20	A. I quit from the semiconductor. I joined	09:42:59
21	a company who make, what you call, a ferrite, like	09:43:02
22	a power, switching power supply.	09:43:07
23	THE COURT REPORTER: I am sorry, I am	09:43:26
24	finding this very unclear.	09:43:26
25	MR. MICHAEL: Yeah, me too.	09:43:26

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Transcript of Stephen Chen

Conducted on July 10, 2018

26

1	THE COURT REPORTER: Perhaps go through	09:43:26
2	the interpreter.	09:43:26
3	THE MAIN INTERPRETER: (Chinese spoken).	09:43:26
4	A. I quit from TI-Acer and joined a new, new	09:43:26
5	start-up company.	09:43:27
6	BY MR. MICHAEL:	09:43:28
7	Q. Mr. Chen, I'm going to ask you to let's	09:43:28
8	try this for a little while. I'm going to ask you	09:43:30
9	to try to give your answers in Mandarin and allow	09:43:32
10	the interpreter to interpret into English.	09:43:35
11	A. Okay.	09:43:46
12	Q. It sounds like you moved out of the	09:43:46
13	semiconductor industry after TI-Acer and you went	09:43:49
14	and got a job at a different company. Can you	09:43:51
15	tell me the name of that company and your	09:43:54
16	position?	09:43:56
17	A. (Through interpreter) Okay. The name of	09:44:03
18	the company is Acme.	09:44:22
19	THE MAIN INTERPRETER: Interpreter	09:44:30
20	spelling, A-c-m-e.	09:44:30
21	A. (Through interpreter) The Chinese of the	09:44:30
22	company is Yuefong.	09:44:31
23	THE MAIN INTERPRETER: Interpreter	09:44:33
24	spelling, Y-u-e-f-o-n-g.	09:44:33
25	BY MR. MICHAEL:	09:44:35

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Transcript of Stephen Chen

Conducted on July 10, 2018

27

1	Q. And what was your title at Acme?	09:44:36
2	A. Engineering manager.	09:44:44
3	Q. And what were the products that Acme	09:44:53
4	developed?	09:44:56
5	A. (Through interpreter) It's a type of a	09:45:15
6	soft magnet to make power supply.	09:45:18
7	Q. Did you eventually return to the	09:45:24
8	semiconductor industry?	09:45:27
9	A. I back to semiconductor again.	09:45:31
10	Q. Okay. What company was your next job	09:45:33
11	that was in the semiconductor industry?	09:45:36
12	A. Nanya Technology.	09:45:44
13	THE COURT REPORTER: Sorry?	09:45:52
14	A. (Through interpreter) Nanya Technology.	09:45:52
15	THE MAIN INTERPRETER: Interpreter	09:45:52
16	spelling, N-a-n-y-a.	09:45:54
17	BY MR. MICHAEL:	09:45:58
18	Q. And what was your title at Nanya?	09:45:59
19	A. It's deputy director.	09:46:02
20	Q. Deputy director of what division?	09:46:08
21	A. Process integration.	09:46:16
22	Q. Was this process integration for memory	09:46:21
23	chips?	09:46:24
24	A. Yes.	09:46:30
25	Q. DRAM?	09:46:34

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Transcript of Stephen Chen

Conducted on July 10, 2018

28

1	A. Yes, they have the technology from Japan	09:46:35
2	company, Oki, O-k-i.	09:46:37
3	Q. And how long did you work at Nanya	09:46:41
4	Technology?	09:46:44
5	A. 10 months.	09:46:45
6	Q. And what was your next job, Mr. Chen?	09:46:46
7	A. Join with Powerchip.	09:46:49
8	Q. And that was a DRAM company?	09:46:58
9	A. Yes.	09:46:59
10	Q. And your position at Powerchip?	09:47:02
11	A. Start with department manager of the	09:47:06
12	process integration.	09:47:09
13	Q. And did your title change over time while	09:47:20
14	you were with Powerchip?	09:47:22
15	A. Change very often. Promote, I always	09:47:35
16	promote.	09:47:37
17	THE COURT REPORTER: Say that again.	09:47:38
18	A. I got a promotion almost every one or	09:47:38
19	every two years. So from the department manager,	09:47:40
20	I changed to deputy director. Then after that,	09:47:42
21	director, and (unclear) manager and	09:47:45
22	vice-president, senior vice-president for past 10	09:47:48
23	years.	09:47:51
24	BY MR. MICHAEL:	09:47:54
25	Q. What was the time period that you worked	09:47:57

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Transcript of Stephen Chen

Conducted on July 10, 2018

29

1	at Powerchip?	09:47:59
2	A. 1996 until 2008 or 2009.	09:48:04
3	Q. And the positions that you held, it	09:48:17
4	started as a department manager of process	09:48:23
5	engineering, you were then promoted up to director	09:48:25
6	and eventually senior vice-president; is that	09:48:27
7	correct?	09:48:29
8	A. Yes.	09:48:42
9	Q. And what were the Powerchip products?	09:48:44
10	A. Technology transfer from the Japan	09:48:55
11	company Mitsubishi for DRAM product technology.	09:48:59
12	Q. Did Powerchip manufacture DRAM?	09:49:04
13	A. Yes.	09:49:10
14	Q. Did it design DRAM?	09:49:11
15	A. No.	09:49:13
16	Q. Who designed the Powerchip DRAM?	09:49:17
17	A. Licensed product from the Mitsubishi	09:49:25
18	Electric.	09:49:28
19	Q. And after Powerchip, what was your next	09:49:35
20	job?	09:49:38
21	A. 2006, I was appoint as the president of	09:49:43
22	the joint venture company between Powerchip and	09:49:47
23	Elpida.	09:50:00
24	THE COURT REPORTER: What is that second	09:50:00
25	company?	09:50:00

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Transcript of Stephen Chen

Conducted on July 10, 2018

30

1	MR. JOHNSON: Elpida, E-l-p-i-d-a.	09:50:00
2	A. E-l-p-i-d-a. It's a joint venture	09:50:00
3	company, Rexchip is a joint venture between Elpida	09:50:05
4	and Powerchip.	09:50:07
5	BY MR. MICHAEL:	09:50:10
6	Q. So in 2006, you were appointed as the	09:50:10
7	president of Rexchip, which is a joint venture	09:50:13
8	between Powerchip and Elpida; correct?	09:50:17
9	A. Yes.	09:50:19
10	Q. And what was Rexchip's primary line of	09:50:34
11	business?	09:50:37
12	A. It's manufacturing. DRAM manufacturing.	09:50:41
13	Q. Did Rexchip design DRAM?	09:50:47
14	A. No. Only manufacturing.	09:50:51
15	Q. Only manufacturing.	09:50:55
16	A. Product sell back to the parent company,	09:50:56
17	Elpida and Powerchip.	09:50:59
18	Q. So did Rexchip manufacture DRAM for	09:51:02
19	Elpida and DRAM for Powerchip?	09:51:06
20	A. Because joint venture, the product we	09:51:18
21	manufactured, we would sell back to the parent	09:51:21
22	company according to the share ratio. So	09:51:24
23	basically 50 percent go back to Elpida, 50 percent	09:51:28
24	go back to Powerchip.	09:51:31
25	Q. Okay. And what was the time period that	09:51:32

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Transcript of Stephen Chen

Conducted on July 10, 2018

31

1	you worked at Rexchip?	09:51:34
2	A. 2006, end of the 2006 until 2013. And	09:51:42
3	acquire, merge by Micron in 2013.	09:51:49
4	Q. What technology node was the DRAM in	09:51:55
5	while you were at Rexchip?	09:51:58
6	A. 70 nanometer.	09:52:11
7	Q. 7-0?	09:52:16
8	A. 2006, start with the 70 nanometer in	09:52:20
9	2006.	09:52:24
10	Q. And when you left in 2013, what was the	09:52:26
11	technology node?	09:52:31
12	A. 20 nanometer? It's 25 in production, 1X	09:52:42
13	nanometer in transfer.	09:52:49
14	THE COURT REPORTER: Could you repeat	09:53:05
15	that, please.	09:53:06
16	A. It should be 25. IX. I have no idea for	09:53:15
17	1X.	09:53:15
18	BY MR. MICHAEL:	09:53:15
19	Q. Let me see if I can clarify --	09:53:15
20	THE COURT REPORTER: Is he saying	09:53:16
21	"wireless"?	09:53:16
22	MR. JOHNSON: 1X.	09:53:16
23	BY MR. MICHAEL:	09:53:18
24	Q. In 2013, was Rexchip producing 25	09:53:18
25	nanometer DRAM?	09:53:24

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Transcript of Stephen Chen

Conducted on July 10, 2018

32

1	A. Yes.	09:53:27
2	Q. And in 2013, was Rexchip producing 20	09:53:28
3	nanometer DRAM?	09:53:34
4	A. No.	09:53:39
5	Q. In 2013, is it correct that Rexchip was	09:53:40
6	in the process of developing manufacturing	09:53:43
7	capabilities for 20 nanometer DRAM?	09:53:48
8	A. No.	09:53:59
9	Q. So as of 2013, Rexchip only had the	09:54:06
10	capability to manufacture 25 nanometer DRAM; is	09:54:09
11	that correct?	09:54:14
12	A. Yes.	09:54:21
13	Q. And you mentioned that in 2013, Micron	09:54:25
14	acquired Rexchip; is that correct?	09:54:32
15	A. Yes.	09:54:37
16	Q. And as the president of Rexchip, were you	09:54:39
17	involved with that acquisition?	09:54:42
18	A. I cannot catch the point. (Chinese	09:54:57
19	spoken).	09:55:02
20	A. (Through interpreter) I don't understand	09:55:03
21	your question.	09:55:04
22	Q. You were the president of Rexchip in	09:55:05
23	2013; correct?	09:55:08
24	A. Yes.	09:55:12
25	Q. And in 2013, Micron acquired Rexchip;	09:55:13

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Transcript of Stephen Chen

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33

1	correct?	09:55:16
2	A. Yes.	09:55:20
3	Q. And as part of that acquisition, there is	09:55:20
4	generally a corporate transaction that's involved	09:55:24
5	for that acquisition. Were you involved in that	09:55:27
6	corporate transaction in any way?	09:55:31
7	MR. JOHNSON: Do you understand	09:55:48
8	"corporate transaction"?	09:55:49
9	A. I know, but I did not get involved	09:55:52
10	because the finance to finance, they make a deal.	09:55:55
11	I have no -- I did not get involved.	09:55:59
12	BY MR. MICHAEL:	09:56:01
13	Q. You were not involved in negotiation of	09:56:02
14	price?	09:56:05
15	A. No.	09:56:06
16	Q. Were you involved in negotiation of	09:56:07
17	retention of employees?	09:56:10
18	A. No.	09:56:15
19	Q. You remained as an employee of the new	09:56:17
20	entity that Micron acquired; correct?	09:56:22
21	A. Yes.	09:56:32
22	Q. And was Rexchip renamed to a new entity	09:56:32
23	name?	09:56:35
24	A. Yes.	09:56:40
25	Q. And what was the name of that entity?	09:56:41

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Transcript of Stephen Chen

Conducted on July 10, 2018

34

1	A. Micron Memory Taiwan, MMT.	09:56:53
2	Q. And at that point in time, you became	09:56:57
3	an employee of Micron; correct?	09:57:00
4	A. Yes.	09:57:04
5	Q. And what was your position with Micron?	09:57:05
6	A. Site director.	09:57:14
7	Q. What were your job responsibilities as	09:57:24
8	site director?	09:57:31
9	A. I report to the VP of the global	09:57:35
10	manufacturing. And just hit some of the KPI VP	09:57:39
11	sent to us, basically on the operation and	09:57:55
12	manufacturing.	09:57:57
13	Q. I'm going to ask you to repeat that one	09:58:00
14	more time. Maybe we'll try to do it in Chinese.	09:58:02
15	A. Okay.	09:58:06
16	Q. So what were your job responsibilities as	09:58:07
17	the site director for Micron?	09:58:10
18	A. (Through interpreter) Mainly to manage	09:58:28
19	the KPIs of the factory, focusing on cost and	09:58:31
20	yield.	09:58:45
21	Q. What is KPI?	09:58:51
22	A. We have a target for the cost, yield, and	09:58:59
23	the quality and cycle time. That's the four major	09:59:04
24	KPI.	09:59:08
25	Q. The factory you're referring to, what was	09:59:20

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Transcript of Stephen Chen

Conducted on July 10, 2018

35

1	the name of the factory?	09:59:22
2	A. (Through interpreter) The name got	09:59:34
3	changed to "Fab 16" in the group of Micron.	09:59:35
4	Q. So you were the site director for	09:59:42
5	Micron's Fab 16 in Taiwan; correct?	09:59:45
6	A. (Through interpreter) I am the director	10:00:07
7	of the site. There is also fab managers managing	10:00:08
8	the fabs.	10:00:11
9	Q. Did the fab managers report up to you?	10:00:13
10	A. Yes.	10:00:20
11	Q. Were you the person in charge of Fab 16	10:00:22
12	for Micron?	10:00:26
13	A. I'm the site director. Very difficult to	10:00:46
14	say. Fab director.	10:00:49
15	Q. Let's try to get at the this way. You	10:00:53
16	reported to the vice-president of global	10:00:56
17	manufacturing at Micron; correct?	10:01:00
18	A. Yes.	10:01:09
19	Q. And who was the vice-president of global	10:01:10
20	manufacturing at the time period you were employed	10:01:12
21	at Micron?	10:01:16
22	A. Wayne. Wayne. W-a-y-n-e.	10:01:26
23	Q. Is Wayne a last name or a first name?	10:01:33
24	A. Wayne is a first name. Wayne Allen.	10:01:40
25	Q. Can you spell the last time for me?	10:01:43

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Transcript of Stephen Chen

Conducted on July 10, 2018

36

1	A. I cannot -- Allen. E or A, I --	10:01:49
2	A-l-l-e-n? Because most of the time, we call him	10:01:56
3	Wayne.	10:02:04
4	MR. MICHAEL: Did you get a spelling on	10:02:04
5	the last name?	10:02:06
6	THE MAIN INTERPRETER: Interpreter's	10:02:08
7	spelling, last name, A-l-l-e-n, Allen.	10:02:09
8	BY MR. MICHAEL:	10:02:16
9	Q. Where was Wayne located?	10:02:17
10	A. Singapore.	10:02:19
11	Q. When did you leave Micron?	10:02:36
12	A. 2015, July.	10:02:42
13	A. (Through interpreter) The end of July.	10:02:49
14	Q. And where did you go?	10:02:51
15	A. I took two months for, for my personal --	10:02:57
16	(Chinese spoken).	10:03:06
17	A. (Through interpreter) I got two months of	10:03:07
18	personal leave.	10:03:09
19	Q. And after your two months of personal	10:03:16
20	leave, did you join UMC?	10:03:18
21	A. (Through interpreter) Yes.	10:03:25
22	Q. What date did you start at UMC?	10:03:26
23	A. In September.	10:03:31
24	A. (Through interpreter) I do not recall the	10:03:34
25	exact date, but in September.	10:03:36

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Transcript of Stephen Chen

Conducted on July 10, 2018

37

1	Q. September 2015, you joined UMC?	10:03:39
2	A. Yes.	10:03:46
3	Q. When you worked for Micron at Fab 16, did	10:03:50
4	Micron manufacture any products at Fab 16 other	10:03:56
5	than DRAM?	10:04:01
6	A. No.	10:04:15
7	Q. When you joined UMC in September 2015,	10:04:21
8	did UMC manufacture DRAM?	10:04:25
9	A. No.	10:04:36
10	Q. Given your background in DRAM technology,	10:04:42
11	why did you choose to join UMC that was not	10:04:46
12	manufacturing DRAM?	10:04:50
13	A. (Through interpreter) I wanted to --	10:05:06
14	A. DRAM company is gone in Taiwan for me.	10:05:10
15	A. (Through interpreter) I wanted to join	10:05:13
16	a company with a foundry. Foundry is the main	10:05:15
17	technology in Taiwan, or the mainstream technology	10:05:19
18	in Taiwan. So that was my original thinking.	10:05:24
19	Q. To be clear, UMC was not in the DRAM	10:05:36
20	business in September 2015; correct?	10:05:39
21	A. Yes.	10:05:50
22	MR. JOHNSON: We've been going a little	10:06:03
23	more than an hour. Can we take a short break?	10:06:04
24	MR. MICHAEL: Yeah, we can take a break.	10:06:12
25	THE VIDEOGRAPHER: We are going off the	10:06:14

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Transcript of Stephen Chen

Conducted on July 10, 2018

38

1	record. The time is 10:06 a.m.	10:06:15
2	(Break taken)	10:06:18
3	THE VIDEOGRAPHER: We are back on the	10:18:27
4	record. The time is 10:18 a.m.	10:18:27
5	(All answers to be given through the interpreter	10:18:29
6	from this point unless otherwise indicated.)	10:18:29
7	BY MR. MICHAEL:	10:18:32
8	Q. When you joined UMC in September 2015,	10:18:33
9	what was your title?	10:18:39
10	A. Senior VP.	10:18:47
11	Q. Were you the senior VP of a particular	10:18:50
12	department or business operation within UMC?	10:18:54
13	A. (In English) Corporate senior VP, not	10:19:07
14	a function group.	10:19:10
15	A. So I was the senior VP to the entire	10:19:16
16	corporate, not to any specific function.	10:19:19
17	Q. What's your title -- what was your next	10:19:22
18	title at UMC, if it changed?	10:19:24
19	A. No, I have been the senior VP the whole	10:19:32
20	time.	10:19:36
21	Q. And what are your job duties and	10:19:37
22	responsibilities as the senior -- corporate senior	10:19:39
23	vice-president?	10:19:43
24	A. Back then, the VP of the procurement	10:20:03
25	department, as well as the facility and	10:20:05

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Transcript of Stephen Chen

Conducted on July 10, 2018

39

1	construction department reported to me.	10:20:08
2	THE CHECK INTERPRETER: I'm sorry, minor	10:20:12
3	correction.	10:20:13
4	"Back then, the VP of the procurement	10:20:13
5	department, and the VP of the facility and	10:20:16
6	construction department both reported to me."	10:20:18
7	A. Later, a VP of the product engineering	10:20:29
8	also reported to me. Later, there was something	10:20:32
9	new, something called Project M, which reported to	10:20:42
10	me.	10:20:47
11	BY MR. MICHAEL:	10:20:58
12	Q. What does the VP of procurement -- strike	10:20:59
13	that.	10:21:04
14	What are the responsibilities of the VP	10:21:05
15	of procurement?	10:21:07
16	A. The sourcing of the equipment and	10:21:21
17	materials are the responsibility of the VP of the	10:21:24
18	procurement department.	10:21:28
19	Q. What about the responsibilities of the VP	10:21:32
20	of facility and construction?	10:21:35
21	A. The operation --	10:21:57
22	THE MAIN INTERPRETER: Excuse me.	10:22:01
23	A. The person in charge of the operation of	10:22:02
24	the facility reports to the VP of facility and	10:22:04
25	construction. And the VP of facility and	10:22:07

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Transcript of Stephen Chen

Conducted on July 10, 2018

40

1	construction also supervises the construction of	10:22:10
2	the new facilities.	10:22:13
3	BY MR. MICHAEL:	10:22:17
4	Q. Does the VP of facility and construction	10:22:18
5	have involvement with equipment procurement?	10:22:20
6	A. Only the procurement department is	10:22:36
7	involved in the equipment procurement.	10:22:38
8	Q. And who was the VP of procurement when	10:22:41
9	you started at UMC in September 2015?	10:22:44
10	A. The name of the person is Mu-Liang Liao.	10:23:06
11	THE MAIN INTERPRETER: Interpreter	10:23:15
12	spelling, first name Mu-Liang, M-u L-i-a-n-g, last	10:23:15
13	name Liao, L-i-a-o.	10:23:16
14	BY MR. MICHAEL:	10:23:19
15	Q. Does Mr. Liao have an English name?	10:23:19
16	A. ML.	10:23:27
17	Q. Is ML the vice-president of procurement	10:23:30
18	today?	10:23:33
19	A. Right now, the procurement department and	10:23:53
20	the department of facility and construction have	10:23:56
21	been integrated. So ML is now the VP of the two	10:23:59
22	departments after the integration. And at the	10:24:04
23	procurement department, there is a senior director	10:24:16
24	who oversees the operation of the procurement	10:24:20
25	department.	10:24:25

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Transcript of Stephen Chen

Conducted on July 10, 2018

41

1	Q. Who -- what is the name of the senior	10:24:28
2	director that oversees the operation of	10:24:30
3	procurement?	10:24:32
4	A. His English name is Louis, L-o-u-i-s.	10:24:44
5	Last name, Xie.	10:24:52
6	THE MAIN INTERPRETER: Interpreter	10:24:56
7	spelling, X-i-e.	10:24:57
8	BY MR. MICHAEL:	10:25:01
9	Q. Who was the vice-president of product	10:25:02
10	engineering when you joined in September 2015?	10:25:04
11	A. His name is SR Xu.	10:25:21
12	THE MAIN INTERPRETER: Interpreter	10:25:29
13	spelling S-R, last name Xu, X-u.	10:25:30
14	BY MR. MICHAEL:	10:25:34
15	Q. And is Mr. Xu still the vice-president of	10:25:34
16	product engineering today?	10:25:37
17	A. Yes.	10:25:44
18	Q. You mentioned there was another project	10:25:48
19	called Project M that you were responsible for.	10:25:51
20	What is Project M?	10:25:54
21	A. It's a project about memory.	10:26:04
22	Q. What type of memory?	10:26:12
23	A. Currently, DRAM memory.	10:26:21
24	Q. Is Project M the DRAM project that	10:26:29
25	involves UMC's technical cooperation with Jinhua?	10:26:33

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Transcript of Stephen Chen

Conducted on July 10, 2018

42

1	A. (In English) Yes.	10:26:51
2	Q. When did Project M start at UMC?	10:26:54
3	A. Officially, supposedly it was after	10:27:08
4	February of 2016.	10:27:12
5	Q. Unofficially, did it start before	10:27:19
6	February 2016?	10:27:21
7	A. I cannot say that way --	10:27:32
8	THE MAIN INTERPRETER: "I cannot say it	10:27:32
9	that way."	10:27:35
10		10:27:53
11		10:27:56
12	announcement. So for this public announcement, it	10:28:00
13	was made in May 2016, after the approval of the	10:28:02
14	board of directors.	10:28:06
15	BY MR. MICHAEL:	10:28:09
16	Q. Did Project M begin at UMC before	10:28:10
17	February 2016?	10:28:16
18	A. Before 2000 -- before February 2016,	10:28:32
19	there was only business discussions.	10:28:36
20	Q. Were you involved in those business	10:28:44
21	discussions regarding Project M before February	10:28:45
22	2016?	10:28:50
23	A. I was involved starting at the end of	10:29:06
24	2015 all the way to the beginning of 2016.	10:29:11
25	Q. Were there a core group of individuals at	10:29:24

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Transcript of Stephen Chen

Conducted on July 10, 2018

43

1	UMC who were involved in early business	10:29:28
2	discussions regarding Project M?	10:29:30
3	A. There was no team, but just one	10:29:48
4	individual.	10:29:51
5	Q. Who was that individual?	10:29:52
6	A. His name is Po-Weng Huang.	10:30:03
7	THE MAIN INTERPRETER: Interpreter's	10:30:14
8	spelling, P-o W-e-n-g. That's the first name.	10:30:17
9	Last name, Huang. Interpreter's spelling,	10:30:17
10	H-u-a-n-g.	10:30:19
11	BY MR. MICHAEL:	10:30:21
12	Q. Does Mr. Huang have an English name?	10:30:21
13	A. (Chinese spoken).	10:30:29
14	THE MAIN INTERPRETER: Oh, okay.	10:30:31
15	A. Bo Wen.	10:30:31
16	THE MAIN INTERPRETER: Interpreter	10:30:31
17	correction. The spelling of the first name,	10:30:33
18	Bo-Wen, is B-o W-e-n.	10:30:35
19	BY MR. MICHAEL:	10:30:42
20	Q. Is there an English name as well?	10:30:43
21	A. (In English) No.	10:30:45
22	A. No.	10:30:45
23	Q. What is -- is it a Mr. Huang?	10:30:45
24	A. Yes.	10:30:49
25	Q. And what is Mr. Huang's title at UMC?	10:30:49

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Transcript of Stephen Chen

Conducted on July 10, 2018

44

1	A. Supposedly or maybe deputy director of	10:31:04
2	finance.	10:31:06
3	Q. Do you know where Mr. Huang worked before	10:31:11
4	he was at UMC?	10:31:14
5	A. I do not know.	10:31:23
6	Q. What does "M" stand for in Project M?	10:31:36
7	A. The name is given by our former CEO. "M"	10:31:48
8	stands for "memory". It's also a collaboration	10:31:53
9	project with mainland China.	10:32:00
10	Q. When you left Micron in July 2015, did	10:32:20
11	you take any Micron technical documents with you?	10:32:30
12	A. (In English) No.	10:32:42
13	A. No.	10:32:45
14	Q. Mr. Chen, when we've used the name	10:33:10
15	Jinhua, you understand that we're referring to	10:33:14
16	Jinhua Integrated Circuit Company; correct?	10:33:19
17	A. Yes, understood.	10:33:29
18	Q. And when I -- if we use the name Jinhua	10:33:30
19	during the course of the day, that's the entity	10:33:32
20	we'll be referring to; fair enough?	10:33:34
21	A. Yes.	10:33:47
22	Q. Did you ever work for Jinhua?	10:33:47
23	A. In February 2017, the board of directors	10:34:30
24	dissolved the -- of UMC dissolved the non-compete	10:34:33
25	restriction. So I was able to be hired, to be the	10:34:38

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Transcript of Stephen Chen

Conducted on July 10, 2018

45

1	president of Jinhua. And so my job officially	10:34:43
2	began after February of 2017 at Jinhua.	10:34:46
3	THE MAIN INTERPRETER: May I confirm the	10:35:14
4	date of the non-compete restriction dissolving	10:35:15
5	with the witness?	10:35:18
6	MR. MICHAEL: I'm okay with that. Are	10:35:20
7	you all right with that?	10:35:23
8	THE MAIN INTERPRETER: May I confirm.	10:35:24
9	MR. JOHNSON: It's his deposition --	10:35:25
10	THE MAIN INTERPRETER: (Chinese spoken).	10:35:30
11	THE COURT REPORTER: No correction?	10:35:39
12	THE MAIN INTERPRETER: So it's the end of	10:35:41
13	February 2017 that the board of directors of UMC	10:35:42
14	dissolved the non-compete restriction.	10:35:45
15	THE COURT REPORTER: Thank you.	10:35:49
16	BY MR. MICHAEL:	10:35:51
17	Q. Mr. Chen, I'm handing you what we have	10:35:52
18	marked as Exhibit No. 31, which is a corporate	10:35:55
19	filing from UMC, and I'd ask that you turn to the	10:36:08
20	very last page of that document.	10:36:10
21	(Exhibit 31 marked for identification - Corporate	10:36:12
22	filing from UMC)	10:36:12
23	BY MR. MICHAEL:	10:36:30
24	Q. Mr. Chen, can you read English?	10:36:31
25	A. Yes.	10:36:33

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Transcript of Stephen Chen

Conducted on July 10, 2018

46

1	Q. And the last page of this document,	10:36:33
2	there's a heading that says "The Board of	10:36:36
3	Directors resolved to release the managerial	10:36:39
4	officer from non-competition restrictions."	10:36:42
5	Do you see that?	10:36:46
6	A. Yes.	10:36:59
7	Q. Is this the board of director resolution	10:37:00
8	that you were referring to that allowed you to	10:37:03
9	become the president of Jinhua?	10:37:07
10	A. Yes.	10:37:18
11	Q. And on what date did you become the	10:37:19
12	president of Jinhua?	10:37:22
13	A. Some time after this date. So it should	10:37:31
14	be after the resolution 8 of the board of	10:37:45
15	directors. It is -- it was only with the approval	10:37:49
16	of UMC that I was able to be the president of	10:37:54
17	Jinhua.	10:37:59
18	THE CHECK INTERPRETER: Sorry, minor	10:38:02
19	correction.	10:38:03
20	"Some time after this date. I would only	10:38:03
21	be able to be the president of Jinhua after this	10:38:10
22	resolution was passed by the board of directors of	10:38:14
23	UMC."	10:38:17
24	BY MR. MICHAEL:	10:38:28
25	Q. Do you recall if you started your role as	10:38:29

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Transcript of Stephen Chen

Conducted on July 10, 2018

47

1	the president of Jinhua in February 2017 or in	10:38:31
2	March 2017?	10:38:36
3	A. I suppose the official effective date is	10:38:59
4	after March 2017.	10:39:04
5	Q. Are you the president of Jinhua today?	10:39:08
6	A. Yes. I am wearing two hats now.	10:39:13
7	Q. Who pays your salary?	10:39:28
8	A. UMC.	10:39:33
9	Q. Do you receive any compensation from	10:39:36
10	Jinhua?	10:39:38
11	A. Only started in the second half of 2017.	10:39:50
12	Q. In the second half of 2017, you received	10:39:56
13	compensation from UMC and Jinhua?	10:40:00
14	A. Yes.	10:40:10
15	Q. Where's Jinhua located?	10:40:12
16	A. In Jinjiang City in the province of	10:40:17
17	Fujian.	10:40:27
18	THE MAIN INTERPRETER: Interpreter	10:40:28
19	spelling, Jinjiang, J-i-n-j-i-a-n-g.	10:40:29
20	BY MR. MICHAEL:	10:40:32
21	Q. On mainland China; correct?	10:40:32
22	A. Yes.	10:40:34
23	Q. What are your job duties and	10:40:37
24	responsibilities as the president of Jinhua?	10:40:39
25	A. I am involved in the major	10:41:03

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Transcript of Stephen Chen

Conducted on July 10, 2018

48

1	decision-making processes of Jinhua, including the	10:41:05
2	procurement issues as well as staffing or	10:41:07
3	employment issues.	10:41:11
4	Q. And by "procurement", you mean	10:41:18
5	procurement of equipment for manufacturing	10:41:20
6	semiconductor devices; correct?	10:41:24
7	A. Yes.	10:41:34
8	Q. And your responsibility for staffing and	10:41:40
9	employment includes recruiting engineers; correct?	10:41:43
10	A. I am not involved in the recruitment	10:42:07
11	activities. I only sign off when there are people	10:42:10
12	being hired by the company. So the employment	10:42:14
13	needs my approval.	10:42:19
14	Q. Which vendor provides the majority of	10:42:45
15	fabrication equipment to Jinhua?	10:42:51
16	MR. JOHNSON: Objection. I allowed you	10:42:54
17	to get background information as to Jinhua. This	10:42:56
18	witness is not here to testify on behalf of	10:42:59
19	Jinhua. Jinhua has its own counsel. I'm	10:43:02
20	instructing him not to answer any further	10:43:04
21	questions.	10:43:06
22	I instruct you not to answer, so don't	10:43:39
23	answer the question.	10:43:42
24	BY MR. MICHAEL:	10:43:45
25	Q. Mr. Chen, in October 2016, you traveled	10:43:46

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Transcript of Stephen Chen

Conducted on July 10, 2018

49

1	to the United States with a delegation of	10:43:48
2	individuals from UMC and Jinhua; correct?	10:43:52
3	A. (In English) Yes.	10:44:10
4	Q. And during that visit you met with Lam	10:44:11
5	Research; correct?	10:44:12
6	A. (In English) Yes.	10:44:19
7	Q. You met with KLA; correct?	10:44:19
8	A. Yes.	10:44:24
9	Q. And you met with Applied Materials;	10:44:25
10	correct?	10:44:27
11	A. Yes.	10:44:31
12	Q. And each of those companies are vendors	10:44:33
13	of fabrication equipment for semiconductor	10:44:36
14	manufacturing; correct?	10:44:39
15	A. Yes, these companies are top 10 companies	10:44:55
16	located in the US.	10:44:58
17	THE CHECK INTERPRETER: I'm sorry, minor	10:45:00
18	correction.	10:45:00
19	The witness's answer was only, "I think	10:45:01
20	these companies are top 10 companies located in	10:45:04
21	the US."	10:45:07
22	BY MR. MICHAEL:	10:45:08
23	Q. For clarification, these three companies	10:45:09
24	supply manufacturing equipment for the fabrication	10:45:11
25	of semiconductor devices; correct?	10:45:16

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Transcript of Stephen Chen

Conducted on July 10, 2018

50

1	A. Yes.	10:45:27
2	Q. And these devices may include items like	10:45:27
3	plasma X reactors and deposition chambers;	10:45:30
4	correct?	10:45:36
5	A. (In English) Yes.	10:45:43
6	A. Yes.	10:45:44
7	Q. In October 2016, you were employed by UMC	10:45:44
8	only and not Jinhua; correct?	10:45:50
9	A. Yes.	10:45:59
10	Q. And in October 2016, when you visited	10:46:00
11	with Lam Research and Applied Materials and KLA,	10:46:02
12	you discussed with them the DRAM project between	10:46:07
13	UMC and Jinhua; correct?	10:46:13
14	A. It was mainly Jinhua who made the	10:46:53
15	presentation. UMC was only there as a technical	10:46:56
16	partner to be present in the meetings.	10:47:01
17	Q. And those meetings involved the	10:47:05
18	discussions of the DRAM project between UMC and	10:47:07
19	Jinhua; correct?	10:47:12
20	A. There was very little discussion about	10:47:32
21	the collaboration project between UMC and Jinhua.	10:47:35
22	It was mainly Jinhua talking about its own plans.	10:47:39
23	Q. Mr. Chen, as the senior vice-president of	10:47:46
24	UMC, you are aware of the type of equipment and	10:47:50
25	the vendor of the equipment that supplies Jinhua;	10:47:55

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Transcript of Stephen Chen

Conducted on July 10, 2018

51

1	correct?	10:47:59
2	A. None of those were decided back then.	10:48:19
3	Q. But today, as the senior corporate	10:48:22
4	vice-president of UMC, you have knowledge of which	10:48:27
5	vendors Jinhua uses for its fabrication equipment;	10:48:31
6	correct?	10:48:35
7	A. I have knowledge because I am the	10:49:01
8	president of Jinhua, not because of my job at UMC.	10:49:05
9	Jinhua began to have equipment procurement	10:49:35
10	starting from this year, and as the president of	10:49:38
11	Jinhua, I need to look at these procurement	10:49:42
12	documents and sign off and approve these	10:49:47
13	documents. And that's how I came to know about	10:49:49
14	the vendors for the manufacturing equipment for	10:49:51
15	Jinhua.	10:49:57
16	Q. To your knowledge, as -- well, let me ask	10:49:58
17	you this way. Does Jinhua provide UMC with	10:50:03
18	equipment for its research and development on the	10:50:08
19	joint DRAM project?	10:50:11
20	MR. JOHNSON: And I'm going to object and	10:50:28
21	instruct the witness not to answer.	10:50:29
22	THE MAIN INTERPRETER: Okay. (Chinese	10:50:31
23	spoken).	10:50:31
24	A. (Chinese spoken).	10:50:51
25	MR. MICHAEL: What's the basis for the	10:50:53

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Transcript of Stephen Chen

Conducted on July 10, 2018

52

1	instruction?	10:50:54
2	MR. JOHNSON: You're asking him for the	10:50:56
3	scope of his knowledge as president of Jinhua.	10:50:57
4	MR. MICHAEL: No, I'm asking him whether	10:51:00
5	Jinhua provides UMC with equipment.	10:51:04
6	MR. JOHNSON: And that is based -- he's	10:51:06
7	just testified his understanding of the equipment	10:51:06
8	is based upon his work as president of Jinhua.	10:51:09
9	That is not the scope of this deposition. Jinhua	10:51:12
10	is a party who, as I understand, has not been	10:51:14
11	served and is separately represented.	10:51:18
12	BY MR. MICHAEL:	10:51:21
13	Q. Has UMC ever received equipment for the	10:51:22
14	DRAM project?	10:51:24
15	A. Yes.	10:51:32
16	Q. And does UMC use equipment for its	10:51:33
17	research and development on the DRAM project?	10:51:36
18	A. So for this joint development project, we	10:52:05
19	tried to use the equipment that UMC has already	10:52:08
20	had, as much as possible. For those not enough by	10:52:11
21	the old equipment, then we buy new equipment.	10:52:17
22	Then the new equipment and tool is from Jinhua.	10:52:21
23	Q. What vendor supplies the new equipment	10:52:27
24	and tool that UMC is using on the joint	10:52:29
25	development project?	10:52:33

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Transcript of Stephen Chen

Conducted on July 10, 2018

53

1	A. So more than 10 vendors, including all	10:52:54
2	top 10 equipment suppliers or vendors. Do you	10:52:59
3	want me to name all of them?	10:53:02
4	Q. Yes.	10:53:07
5	A. So, Applied Materials, and then ASML.	10:53:18
6	Lam Research also. KLA-Tencor. TEL from Japan.	10:53:27
7	Screen, S-c-r-e-e-n. And also HKE from Japan.	10:53:46
8	Also vendors from Korea, for example IPS. Jusung,	10:54:09
9	J-u-s-u-n-g. And also another Korean vendor	10:54:21
10	called SM.	10:54:26
11	THE CHECK INTERPRETER: ASM.	10:54:30
12	THE MAIN INTERPRETER: Interpreter	10:54:32
13	correction. "ASM from Korea."	10:54:33
14	A. So based on my understanding, many of	10:54:38
15	them.	10:54:40
16	BY MR. MICHAEL:	10:54:44
17	Q. For equipment that UMC is using in the	10:54:44
18	joint development DRAM project, does UMC pay for	10:54:48
19	that equipment?	10:54:52
20	A. Not for the equipment itself, but UMC	10:55:10
21	pays for the operation as well as the maintenance	10:55:14
22	of the equipment.	10:55:17
23	Q. Who pays for the equipment itself?	10:55:19
24	A. Jinhua.	10:55:24
25	Do I need to return the document to you?	10:56:13

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Transcript of Stephen Chen

Conducted on July 10, 2018

54

1	Q. You can leave it there.	10:56:15
2	(Exhibit 32 marked for identification - Exhibit 4	10:57:05
3	previously filed in court hearing)	10:57:05
4	BY MR. MICHAEL:	10:57:13
5	Q. Mr. Chen, I've handed you what's been	10:57:15
6	marked as Exhibit 32. I will represent to you	10:57:17
7	that this is an exhibit that was filed with the	10:57:20
8	court in connection with the parties' briefing on	10:57:25
9	a jurisdictional dispute, and what it purports to	10:57:33
10	contain is a certified translation of a	10:57:36
11	taidaily.com article, and it is titled "Taiwan	10:57:38
12	DRAM industry veteran Stephen Chen to assist	10:57:49
13	China's Jinhua in plant construction".	10:57:53
14	Mr. Chen, can you turn to the page that	10:58:41
15	has a picture of an individual. Is that you,	10:58:43
16	Mr. Chen?	10:58:52
17	A. (In English) Yes. The picture is when	10:58:54
18	I worked at Rexchip. (Chinese spoken).	10:58:57
19	Q. It's a very complimentary picture.	10:59:04
20	A. But it's not a current picture. It's	10:59:08
21	an old picture.	10:59:11
22	A. (In English) 10 years ago.	10:59:13
23	A. 10 years ago, when I was working for	10:59:15
24	Rexchip.	10:59:17
25	Q. Above your picture, there's a line that	10:59:18

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Transcript of Stephen Chen

Conducted on July 10, 2018

55

1	reads:	10:59:22
2	"... UMC agreed to the appointment of	10:59:24
3	Stephen Chen as president of JHICC to assist in	10:59:25
4	plant construction."	10:59:28
5	Do you see that?	10:59:32
6	A. Yes.	10:59:46
7	Q. Was that your understanding of your	10:59:50
8	appointment by UMC in February 2017, was to assist	10:59:51
9	in plant construction at Jinhua?	10:59:57
10	A. Yes.	11:00:12
11	Q. And if I could ask you to look to the	11:00:15
12	last sentence on that page, it reads:	11:00:17
13	"JHICC would commence mass production as	11:00:20
14	early as in 2018 and Stephen Chen would not	11:00:26
15	participate in JHICC's operation going forward,	11:00:30
16	UMC said."	11:00:38
17	Do you see that?	11:00:44
18	A. Yes.	11:00:51
19	Q. Is it your understanding that you will no	11:00:54
20	longer participate in Jinhua's operations once	11:00:57
21	Jinhua commences production of DRAM products?	11:01:04
22	A. It was the work condition approved by the	11:01:43
23	board of directors. However, there is yet to be	11:01:47
24	a clear decision. If necessary, it is needed for	11:01:51
25	the board of directors to again dissolve the	11:01:55

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Transcript of Stephen Chen

Conducted on July 10, 2018

56

1	non-compete restriction.	11:01:58
2	Q. So you don't know if you're going to	11:02:01
3	remain on with Jinhua or not?	11:02:03
4	A. That is correct.	11:02:21
5	(Exhibit 33 marked for identification - Exhibit C	11:03:00
6	previously filed in court hearing)	11:03:00
7	BY MR. MICHAEL:	11:03:06
8	Q. Mr. Chen, we've marked as Exhibit 33 what	11:03:07
9	I'll represent to you is another exhibit that was	11:03:11
10	filed in the court proceedings between the parties	11:03:13
11	in connection with the jurisdictional motion, and	11:03:20
12	if you look at page 2, it contains the cover sheet	11:03:22
13	for a UMC SEC filing, and the remainder of the	11:03:40
14	document are various pages of that SEC filing.	11:03:45
15	And if you look at the top right corner,	11:04:05
16	there are page numbers. Can I ask you to turn to	11:04:08
17	page 16 of 20. And at the top of the page, there	11:04:11
18	is a heading that is, states, "DRAM Technology	11:04:30
19	Cooperation Agreement, dated May 13, 2016, between	11:04:35
20	Us and Fujian Jinhua". Do you see that?	11:04:39
21	A. Yes.	11:04:47
22	Q. And the first sentence states:	11:04:51
23	"We entered into a technology cooperation	11:04:53
24	agreement with Fujian Jinhua on May 13, 2016 to	11:04:56
25	jointly develop DRAM related technologies."	11:05:02

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Transcript of Stephen Chen

Conducted on July 10, 2018

57

1	Do you see that?	11:05:08
2	A. Yes.	11:05:23
3	Q. Were you involved in negotiating the	11:05:24
4	technology cooperation agreement on behalf of UMC?	11:05:26
5	A. Yes, part of it.	11:05:39
6	Q. Did you sign the agreement on behalf of	11:05:41
7	UMC?	11:05:43
8	A. No.	11:05:48
9	Q. Who signed the agreement on behalf of	11:05:49
10	UMC, if you know?	11:05:51
11	A. Probably somebody from the finance	11:05:58
12	department.	11:06:00
13	Q. And to the best of your knowledge, was	11:06:01
14	that agreement entered into on May 13, 2016? Is	11:06:05
15	that a correct statement?	11:06:08
16	A. I suppose so.	11:06:19
17	Q. And then the next sentence says:	11:06:21
18	"Under the agreement, Fujian Jinhua will	11:06:23
19	provide us with related equipment for our research	11:06:25
20	and development ..."	11:06:30
21	Do you see that?	11:06:33
22	A. Yes.	11:06:41
23	[REDACTED]	11:06:41
24	[REDACTED]	11:06:45
25	[REDACTED]	11:06:48

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Transcript of Stephen Chen

Conducted on July 10, 2018

58

1	[REDACTED]	11:06:58
2	[REDACTED]	11:06:59
3	[REDACTED]	11:07:02
4	[REDACTED]	11:07:10
5	[REDACTED]	11:07:12
6	[REDACTED]	11:07:17
7	[REDACTED]	11:07:20
8	[REDACTED]	11:07:25
9	[REDACTED]	11:07:26
10	[REDACTED]	11:07:28
11	[REDACTED]	11:07:31
12	[REDACTED]	11:07:35
13	[REDACTED]	11:07:37
14	[REDACTED]	11:08:02
15	[REDACTED]	11:08:03
16	[REDACTED]	11:08:04
17	[REDACTED]	11:08:06
18	[REDACTED]	11:08:12
19	[REDACTED]	11:08:12
20	[REDACTED]	11:08:15
21	[REDACTED]	11:08:21
22	Q. Aside from you, Mr. Chen, who at Jinhua	11:08:24
23	is involved in the procurement -- strike the	11:08:36
24	question.	11:08:39
25	MR. JOHNSON: It's gone over an hour.	11:09:04

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Transcript of Stephen Chen

Conducted on July 10, 2018

59

1 You want to break now or you want to ask another

11:09:06

2 couple of questions before we break?

11:09:08

3 MR. MICHAEL: We can break.

11:09:14

4 MR. JOHNSON: All right.

11:09:16

5 THE VIDEOGRAPHER: We are going off the

11:09:16

6 record. The time is 11:09 a.m.

11:09:17

7 (Break taken)

11:09:19

8 THE VIDEOGRAPHER: We are back on the

11:28:41

9 record. The time is 11:28 a.m.

11:28:42

10 BY MR. MICHAEL:

11:28:49

11 Q. Mr. Chen, you testified that you were

11:28:51

12 involved with negotiating portions of the

11:28:53

13 technology cooperation agreement between UMC and

11:28:57

14 Jinhua; correct?

11:29:00

15 A. Yes.

11:29:13

16 Q. What parts of the agreement were you

11:29:15

17 responsible for negotiating?

11:29:17

18 [REDACTED]

11:29:27

19 [REDACTED]

11:29:29

20 [REDACTED]

11:29:37

21 [REDACTED]

11:29:57

22 [REDACTED]

11:30:03

23 [REDACTED]

11:30:08

24 Q. What was the timeframe of technology

11:30:24

25 development that was ultimately agreed to as part

11:30:27

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## CONFIDENTIAL - ATTORNEYS' EYES ONLY

Transcript of Stephen Chen

Conducted on July 10, 2018

60

1 of the agreement?

11:30:30

2 A. So it should be February or March of

11:30:48

3 2016. But the whole -- but the whole project

11:30:52

4 needed to be approved by the Taiwanese government.

11:31:04

5 That is why the board of directors of UMC approved

11:31:08

6 in May.

11:31:12

7 Q. You said that you were involved with

11:31:15

8 negotiating the timeframe for technology

11:31:17

9 development; correct?

11:31:19

10 A. Yes.

11:31:27

11 Q. Can you tell me what that timeframe was

11:31:28

12 that was set forth in the cooperation agreement,

11:31:33

13 if any?

11:31:36

14 A. So the timeframe of the whole project was

11:31:58

15 four years, and within that four years of

11:32:02

16 timeframe, two generations of technologies were to

11:32:08

17 be developed.

11:32:12

18 Q. What were those two generations?

11:32:14

19 A. So according to our definition, it was

11:32:33

20 F32 and F32 shrink version.

11:32:36

21 Q. What does F32 stand for?

11:32:45

22 A. So the cell size was 6 F square. "F"

11:33:01

23 stands for 32 nanometer.

11:33:10

24 Q. The F32 product design was for a 32

11:33:19

25 nanometer DRAM device?

11:33:22

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Transcript of Stephen Chen

Conducted on July 10, 2018

61

1	A. So the feature size is 32.	11:33:35
2	Q. What's the technology node for the F32?	11:33:38
3	A. The reason that we defined the name this	11:34:00
4	way was because we didn't want to compare based on	11:34:04
5	technology nodes. We wanted to compare based on	11:34:08
6	cell size.	11:34:11
7	Q. Does the F32 compare to a 25 nanometer	11:34:15
8	DRAM device?	11:34:21
9	A. Not entirely.	11:34:34
10	Q. How does it differ?	11:34:38
11	A. The minimum print pattern for some of	11:34:51
12	them, it could be less than 20 nanometers.	11:34:54
13	Because it is different from the layout of the	11:35:04
14	cell.	11:35:06
15	THE CHECK INTERPRETER: I'm sorry,	11:35:10
16	correction to the last sentence.	11:35:11
17	"Because it depends on the layout of the	11:35:13
18	cell."	11:35:15
19	BY MR. MICHAEL:	11:35:21
20	Q. In the four-year development time period,	11:35:21
21	how much of that time was UMC committed to R&D for	11:35:26
22	the F32?	11:35:30
23	A. (In English) At least two years.	11:35:44
24	Q. And in February 2016, how many	11:35:49
25	DRAM-experienced engineers worked at UMC?	11:36:01

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Transcript of Stephen Chen

Conducted on July 10, 2018

62

1	A. There were some who were already with UMC	11:36:36
2	back then who had DRAM experience. UMC also hired	11:36:39
3	some from outside.	11:36:45
4	Q. Approximately how many experienced	11:36:48
5	engineers in DRAM technology existed at UMC in	11:36:50
6	February 2016?	11:36:56
7	MR. JOHNSON: Don't guess. Give him your	11:37:07
8	best approximation, if you know.	11:37:09
9	A. (In English) I have no idea.	11:37:25
10	BY MR. MICHAEL:	11:37:32
11	Q. Okay.	11:37:32
12	A. Because there is common ground between	11:37:44
13	DRAM and semiconductor technologies, so I cannot	11:37:49
14	say that somebody who only specializes in pure	11:37:52
15	DRAM technologies or pure logic technologies. So	11:37:56
16	a lot of engineers have expertise in various	11:38:00
17	aspects.	11:38:04
18	Q. If you know, in February 2016, how many	11:38:06
19	engineers were employed at Jinhua with DRAM	11:38:14
20	experience?	11:38:18
21	MR. JOHNSON: Objection. Instruct not to	11:38:27
22	answer.	11:38:29
23	A. (Chinese spoken).	11:38:35
24	MR. MICHAEL: What's the instruction	11:38:36
25	based on?	11:38:37

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Transcript of Stephen Chen

Conducted on July 10, 2018

63

1	MR. JOHNSON: Well, this testimony is	11:38:41
2	supposedly limited to recruiting. He can testify	11:38:42
3	his understanding as it relates to the information	11:38:45
4	at UMC. He is not going to testify about what is	11:38:49
5	going on at Jinhua. That's not the subject of	11:38:53
6	this deposition.	11:38:56
7	MR. MICHAEL: So they have a joint	11:38:57
8	development agreement with Jinhua. I'm trying to	11:38:58
9	establish how many experienced DRAM engineers	11:39:00
10	exist at UMC and Jinhua as part of this joint	11:39:04
11	development agreement so that we can assess the	11:39:09
12	needs for recruiting. So these are foundational	11:39:11
13	questions --	11:39:14
14	MR. JOHNSON: I don't think --	11:39:14
15	MR. MICHAEL: -- and they're based on his	11:39:14
16	background and experience solely as a UMC employee	11:39:16
17	in February 2016.	11:39:19
18	MR. JOHNSON: You asked him for his	11:39:22
19	knowledge of how many engineers existed at Jinhua	11:39:23
20	at the time.	11:39:26
21	MR. MICHAEL: Yep.	11:39:29
22	MR. JOHNSON: Right? And he can testify	11:39:30
23	about his understanding --	11:39:33
24	MR. MICHAEL: That's all I'm asking.	11:39:35
25	MR. JOHNSON: -- when he was at UMC.	11:39:38

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Transcript of Stephen Chen

Conducted on July 10, 2018

64

1	MR. MICHAEL: That's all I'm asking.	11:39:41
2	MR. JOHNSON: When you were at UMC in	11:39:43
3	February 2016, you could testify if you had an	11:39:45
4	opinion, one way or the other, about how many	11:39:45
5	Jinhua engineers existed.	11:39:47
6	BY MR. MICHAEL:	11:39:50
7	Q. So I'm going to ask the question again.	11:39:50
8	In February 2016, to your understanding, how many	11:39:53
9	Jinhua engineers experienced at DRAM technology	11:39:58
10	were employed?	11:40:02
11	A. None at Jinhua back then.	11:40:26
12	Q. Mr. Chen, I'm handing you what has been	11:40:34
13	previously marked as Exhibit 23.	11:40:36
14	(Exhibit 23, as previously marked - Document with	11:40:38
15	Bates number UMCCORPJD000001)	11:40:38
16	BY MR. MICHAEL:	11:40:52
17	Q. Mr. Chen, I'm going to refer you to the	11:40:53
18	email on the bottom of the page here or midway	11:40:56
19	through the page.	11:41:00
20	[REDACTED]	11:41:00
21	[REDACTED]	11:41:08
22	[REDACTED]	11:41:18
23	[REDACTED]	11:41:26
24	[REDACTED]	11:41:30
25	[REDACTED]	11:41:35

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Transcript of Stephen Chen

Conducted on July 10, 2018

65

1	[REDACTED]	11:41:35
2	[REDACTED]	11:41:38
3	[REDACTED]	11:41:43
4	[REDACTED]	11:41:46
5	[REDACTED]	11:41:48
6	[REDACTED]	11:41:51
7	[REDACTED]	11:41:53
8	[REDACTED]	11:41:59
9	[REDACTED] [REDACTED]	11:42:26
10	[REDACTED]	11:42:30
11	[REDACTED]	11:42:35
12	[REDACTED] [REDACTED]	11:42:36
13	[REDACTED]	11:42:39
14	[REDACTED] [REDACTED]	11:42:56
15	[REDACTED]	11:43:00
16	[REDACTED] [REDACTED]	11:43:05
17	[REDACTED]	11:43:20
18	[REDACTED]	11:43:27
19	Q. Thank you, Mr. Chen.	11:43:28
20	My question is -- let me follow up with	11:43:29
21	that.	11:43:31
22	A. (In English) Okay.	11:43:32
23	Q. Are you aware of a document that is	11:43:32
24	called the Manpower Plan?	11:43:34
25	A. You mean at Jinhua?	11:43:48

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Transcript of Stephen Chen

Conducted on July 10, 2018

66

1	Q. No, UMC.	11:43:50
2	A. No.	11:43:54
3	Q. To your knowledge, did the technology	11:43:56
4	cooperation agreement between UMC and Jinhua	11:43:58
5	obligate UMC to assist with recruiting engineers	11:44:02
6	for the joint DRAM project?	11:44:09
7	A. No, there is no such obligation for UMC.	11:44:28
8	Q. Ultimately, UMC did assist Jinhua with	11:44:35
9	recruiting engineers; correct?	11:44:38
10	A. Well, it was supposedly just me	11:45:02
11	personally asking Jeff and Jennifer from UMC to	11:45:05
12	provide some assistance at CASPA.	11:45:08
13	Q. But UMC assisted Jinhua in recruiting	11:45:15
14	employees for the joint DRAM project; correct?	11:45:17
15	A. Only to assist with the CASPA event, not	11:45:36
16	anything else.	11:45:39
17	Q. Mr. Chen, I've handed you what has been	11:46:19
18	previously marked as Exhibit 30.	11:46:21
19	(Exhibit 30, as previously marked - Document with	11:46:24
20	Bates numbers UMCCORPJD000008 through 12)	11:46:24
21	BY MR. MICHAEL:	11:46:26
22	Q. It's a document that contains the Bates	11:46:33
23	numbers UMCCORPJD8 through 12.	11:46:36
24	Mr. Chen, can you take a minute and	11:47:07
25	familiarize yourself with this document and let me	11:47:09

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Transcript of Stephen Chen

Conducted on July 10, 2018

67

1	know if you've seen this before.	11:47:12
2	A. I knew I was going to attend the CASPA	11:48:27
3	event, but I did not see this document before.	11:48:30
4	Q. Mr. Chen, did you present at the CASPA	11:48:43
5	event?	11:48:46
6	A. No.	11:48:53
7	Q. You didn't speak at all during the CASPA	11:48:54
8	event?	11:48:57
9	A. No.	11:49:03
10	Q. Did you attend the CASPA event?	11:49:04
11	A. I attended the job event of Jinhua.	11:49:15
12	I think it was during lunchtime.	11:49:20
13	Q. Can you identify -- it appears from the	11:49:46
14	itinerary here there's three days of the CASPA	11:49:50
15	event. There's Friday, October 21; Saturday,	11:49:53
16	October 22; and Sunday, October 23. Which portion	11:50:04
17	or day did you attend?	11:50:10
18	A. Only on day 3, which is Jinhua's	11:50:42
19	promotion section, so this is the third day of the	11:50:45
20	agenda.	11:50:50
21	Q. If you turn to the last page of this	11:50:58
22	document, Mr. Chen, it says the keynote speaker is	11:51:01
23	Albert Wu, operations VP/COO of Jinhua. Do you	11:51:05
24	see that?	11:51:10
25	A. Yes.	11:51:21

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Transcript of Stephen Chen

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69

1	[REDACTED]	11:54:37
2	[REDACTED]	11:54:39
3	[REDACTED]	11:54:56
4	[REDACTED]	11:54:58
5	[REDACTED]	11:55:22
6	[REDACTED]	11:55:24
7	[REDACTED]	11:55:27
8	[REDACTED]	11:55:33
9	[REDACTED]	11:55:38
10	[REDACTED]	11:55:40
11	[REDACTED]	11:55:47
12	[REDACTED]	11:55:59
13	[REDACTED]	11:56:00
14	[REDACTED]	11:56:03
15	[REDACTED]	11:56:22
16	[REDACTED]	11:56:26
17	[REDACTED]	11:56:40
18	BY MR. MICHAEL:	11:56:52
19	Q. Did you interview engineers during the	11:56:52
20	CASPA event?	11:56:55
21	A. No.	11:57:02
22	Q. Did anyone at UMC, to your knowledge,	11:57:02
23	interview engineers during the CASPA event?	11:57:05
24	A. Based on my understanding, it was	11:57:35
25	Jennifer and Sandy Kuo from UMC who were there to	11:57:39

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Transcript of Stephen Chen

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70

1	collect resumes, and then they did some	11:57:44
2	interviews.	11:57:47
3	Q. And you were not involved in the	11:57:50
4	interviews; is that your testimony?	11:57:52
5	A. That is correct.	11:57:59
6	[REDACTED]	11:58:07
7	[REDACTED]	11:58:14
8	[REDACTED]	11:58:27
9	[REDACTED]	11:58:30
10	[REDACTED]	11:58:43
11	[REDACTED]	11:58:46
12	[REDACTED]	11:58:48
13	[REDACTED]	11:58:51
14	[REDACTED]	11:58:56
15	[REDACTED]	11:58:59
16	[REDACTED]	11:59:02
17	[REDACTED]	11:59:14
18	[REDACTED]	11:59:16
19	[REDACTED]	11:59:18
20	[REDACTED]	11:59:25
21	[REDACTED]	11:59:44
22	[REDACTED]	11:59:49
23	[REDACTED]	11:59:52
24	[REDACTED]	12:00:00
25	[REDACTED]	12:00:04

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Transcript of Stephen Chen

Conducted on July 10, 2018

71

1	[REDACTED]	12:00:16
2	[REDACTED]	12:00:16
3	[REDACTED]	12:00:19
4	[REDACTED]	12:00:22
5	[REDACTED]	12:00:56
6	[REDACTED]	12:00:58
7	[REDACTED]	12:01:01
8	[REDACTED]	12:01:28
9	[REDACTED]	12:01:29
10	[REDACTED]	12:01:38
11	[REDACTED]	12:01:43
12	[REDACTED]	12:01:46
13	[REDACTED]	12:01:49
14	[REDACTED]	12:01:52
15	[REDACTED]	12:02:05
16	[REDACTED]	12:02:11
17	[REDACTED]	12:02:16
18	Q. Do you know what CASPA stands for?	12:02:23
19	A. I only know the Chinese name of CASPA.	12:02:50
20	I do not know the English name for CASPA. So	12:02:53
21	CASPA is basically a semiconductor association	12:02:57
22	formed by Chinese and American parties.	12:03:03
23	Q. What is your understanding of the reason	12:03:12
24	why UMC and Jinhua attended the CASPA event in	12:03:16
25	October 2016?	12:03:22

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Transcript of Stephen Chen

Conducted on July 10, 2018

72

1	A. Based on my understanding, the CASPA	12:03:46
2	event was held in October, and six months prior to	12:03:48
3	that, which was in April, SMC [sic] attended. So	12:03:53
4	it is Jinhua's belief that since the companies in	12:04:16
5	the same industry attended this event to introduce	12:04:22
6	themselves to everybody, and then Jinhua was --	12:04:30
7	supposedly also need to go to this event.	12:04:33
8	[REDACTED]	12:04:52
9	[REDACTED]	12:04:58
10	[REDACTED]	12:05:01
11	[REDACTED]	12:05:07
12	[REDACTED] [REDACTED]	12:05:10
13	[REDACTED]	12:05:26
14	[REDACTED]	12:05:32
15	[REDACTED]	12:05:35
16	[REDACTED]	12:05:38
17	[REDACTED] [REDACTED]	12:05:49
18	[REDACTED] [REDACTED]	12:05:53
19	[REDACTED]	12:05:57
20	[REDACTED] [REDACTED] [REDACTED]	12:06:00
21	[REDACTED] [REDACTED]	12:06:06
22	[REDACTED] [REDACTED]	12:06:07
23	[REDACTED] [REDACTED]	12:06:24
24	BY MR. MICHAEL:	12:07:26
25	Q. Mr. Chen, I've handed you what has been	12:07:28

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Transcript of Stephen Chen

Conducted on July 10, 2018

73

1 previously marked as Exhibit 9. The first page of  
2 the document says "JHICC Introduction". It looks  
3 to be dated October 2016.

4 For the record, it has the Bates numbers  
5 UMCCORP 17 through 29 -- excuse me, through 30.

6 (Exhibit 9, as previously marked - Document with  
7 Bates numbers UMCCORPJD000017 through 30)

8 BY MR. MICHAEL:

9 Q. Mr. Chen, have you seen this document,  
10 either in its documentary form or in  
11 a presentation before?

12 A. This is a piece of material used in the  
13 CASPA presentation.

14 Q. My question is: have you seen it before?

15 A. You mean before today or before the CASPA  
16 event?

17 Q. Before today.

18 A. Yes, I saw it at the CASPA event.

19 Q. Did you see it before the CASPA event?

20 A. No.

21 Q. Were you involved in the preparation of  
22 any of the information that's contained within  
23 Exhibit 9?

24 A. Yes, some parts of it.

25 Q. Can you identify those parts and what

12:07:30

12:07:38

12:07:42

12:07:44

12:07:46

12:07:52

12:07:52

12:08:09

12:08:10

12:08:12

12:08:14

12:08:27

12:08:30

12:08:32

12:08:43

12:08:45

12:08:47

12:08:50

12:08:53

12:09:01

12:09:02

12:09:04

12:09:07

12:09:17

12:09:20

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Transcript of Stephen Chen

Conducted on July 10, 2018

74

1	your involvement was?	12:09:23
2	A. Parts involving technology development	12:09:33
3	and milestones.	12:09:35
4	Q. Can you do me a favor, Mr. Chen, and	12:09:40
5	using the page numbers on the bottom right corner,	12:09:42
6	identify for me the pages where you -- where	12:09:45
7	there's information where you had input?	12:10:03
8	A. Page 23.	12:10:06
9	Q. And what was your involvement in	12:10:09
10	connection with the source of information on	12:10:12
11	page 23?	12:10:14
12	A. I gave the description of the structure	12:10:31
13	of the joint development between Jinhua and UMC.	12:10:34
14	Q. And does the right side of page 23, under	12:10:38
15	the heading "Development & Operation", depict the	12:10:43
16	basic structure of the joint development?	12:10:46
17	A. Yes.	12:11:04
18	Q. And it has UMC doing process development,	12:11:04
19	and Jinhua doing chip manufacture; correct?	12:11:07
20	A. Yes.	12:11:15
21	Q. Is Jinhua also responsible for chip	12:11:20
22	design, or is that a separate entity?	12:11:22
23	A. According to the structure, we ask	12:11:36
24	a design service company to help Jinhua to do	12:11:40
25	product design. So according to the structure,	12:11:43

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Transcript of Stephen Chen

Conducted on July 10, 2018

75

1 UMC was to develop the process technologies and 12:12:09  
2 then offer the process technologies, and then 12:12:12  
3 Jinhua can hire design houses to help with the 12:12:15  
4 product design. So this kind of structure is very 12:12:18  
5 similar to the foundry structure of UMC. 12:12:21  
6 Q. Was a design service company ultimately 12:12:30  
7 engaged to work on chip design? 12:12:33  
8 A. Initially there were two design service 12:12:52  
9 houses involved in the design of the product. 12:12:55  
10 Q. And what are the names of those 12:12:57  
11 companies? 12:12:58  
12 [REDACTED] 12:13:06  
13 [REDACTED] 12:13:08  
14 [REDACTED] [REDACTED] 12:13:10  
15 [REDACTED] [REDACTED] [REDACTED] 12:13:16  
16 [REDACTED] [REDACTED] 12:13:30  
17 [REDACTED] [REDACTED] 12:13:36  
18 [REDACTED] 12:13:50  
19 [REDACTED] 12:13:52  
20 Q. Any other information in this document 12:13:58  
21 that you helped source? 12:14:00  
22 A. There's another one on page 25 which is 12:14:17  
23 about technology roadmap. I think that's it. 12:14:20  
24 Q. Did you create the milestone and 12:14:28  
25 technology roadmap on page 25? 12:14:31

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Transcript of Stephen Chen

Conducted on July 10, 2018

76

1	A. It was the result of the joint discussion	12:14:44
2	within the team.	12:14:48
3	Q. And what team are you referring to?	12:14:49
4	A. The R&D team of UMC and the team of	12:15:01
5	Jinhua.	12:15:04
6	Q. This milestone and technology roadmap has	12:15:27
7	construction being completed by year-end 2018. Do	12:15:31
8	you see that?	12:15:35
9	A. Yes.	12:15:50
10	Q. Is that -- let me ask you this, Mr. Chen.	12:15:52
11	This document shows construction and then it	12:16:00
12	shows, for the technology roadmap, it shows	12:16:05
13	production. It does not show research and	12:16:09
14	development. Is that correct?	12:16:12
15	A. So this is the milestone and technology	12:16:53
16	roadmap of Jinhua, and for UMC, there's a matching	12:16:58
17	development chart. So UMC began its R&D work in	12:17:01
18	2016, and hopefully in two years' time, in the	12:17:06
19	second half of 2018, the R&D works of UMC would be	12:17:09
20	able to have some preliminary results so as to	12:17:13
21	have technology transfer to Jinhua.	12:17:17
22	Q. And currently today, how many engineers	12:17:27
23	does UMC have working on research and development	12:17:30
24	for the joint DRAM project?	12:17:33
25	A. I do not recall the exact number, but	12:17:52

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Transcript of Stephen Chen

Conducted on July 10, 2018

77

1	based on my memory, it should be around 370.	12:17:56
2	3-0 --	12:18:01
3	THE MAIN INTERPRETER: 3-7-0.	12:18:05
4	BY MR. MICHAEL:	12:18:06
5	Q. Can I ask you to turn to Bates number 28.	12:18:06
6	It has the talent recruiting plan chart. Do the	12:18:11
7	manpower numbers in this chart refer to Jinhua	12:18:26
8	only, or does this include UMC as well?	12:18:33
9	A. Jinhua only.	12:18:46
10	Q. And if you turn to page 30, it says "Job	12:19:08
11	Openings for USA" on the right side. Do you see	12:19:19
12	that? And the job openings for the USA include	12:19:23
13	"Category", "Function" and "Job Description";	12:19:33
14	correct?	12:19:39
15	A. It's a pretty standard chart for any job	12:20:02
16	fairs.	12:20:06
17	Q. And these are showing job openings at	12:20:07
18	both UMC and Jinhua; correct?	12:20:10
19	A. Jinhua only, I think. Nothing to do with	12:20:22
20	UMC. Because it's a --	12:20:27
21	Q. If we look at the first category, the	12:20:29
22	first function is DRAM process technology. Isn't	12:20:31
23	that UMC?	12:20:34
24	A. But it was Jinhua who attended the CASPA	12:21:00
25	event for its recruiting purpose. UMC was only	12:21:06

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Transcript of Stephen Chen

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78

1 there to support Jinhua with some manpower. It 12:21:11

2 was not UMC there to recruit people. 12:21:15

3 THE CHECK INTERPRETER: Minor 12:21:24

4 clarification to the last sentence. 12:21:24

5 The witness's answer was, "UMC was not 12:21:27

6 there to recruit people." 12:21:30

7 A. So Jinhua -- there was Jinhua there to 12:21:49

8 find people for their operation and manufacturing, 12:21:54

9 not -- not for their R&D. So it was an event for 12:21:58

10 Jinhua, not for UMC. 12:22:02

11 BY MR. MICHAEL: 12:22:05

12 Q. Why does this chart say, "Job openings 12:22:06

13 for research and development", Mr. Chen? 12:22:11

14 MR. JOHNSON: And objection. Lack of 12:22:22

15 foundation. Calls for speculation. 12:22:25

16 You can answer if you know. 12:22:36

17 A. For a newly established company, Jinhua 12:23:02

18 was only there to have a standard chart for job 12:23:05

19 openings, for people in the US who were interested 12:23:08

20 in these job openings. So basically, everything 12:23:12

21 listed in this chart is very similar to any 12:23:15

22 company that has job openings, to have such a job 12:23:19

23 opening description. 12:23:24

24 BY MR. MICHAEL: 12:23:27

25 Q. Mr. Chen, UMC's responsibility under the 12:23:28

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Transcript of Stephen Chen

Conducted on July 10, 2018

79

1	technical cooperation agreement with Jinhua	12:23:32
2	includes development of DRAM process technology;	12:23:35
3	correct?	12:23:41
4	A. Yes.	12:23:58
5	Q. Mr. Chen, I've handed you what was	12:24:30
6	previously marked as Exhibit 29. I just have	12:24:33
7	a couple of questions on this document.	12:24:39
8	(Exhibit 29, as previously marked - Document with	12:24:42
9	Bates numbers UMCCORPJD000041 through 46)	12:24:42
10	BY MR. MICHAEL:	12:24:50
11	Q. For the record, it bears the Bates stamp	12:24:50
12	number UMCCORPJD 41 through 46.	12:24:53
13	Mr. Chen, I'd like to ask you to turn to	12:25:08
14	the back half of this document, starting at number	12:25:13
15	44. This appears to include a schedule for a	12:25:16
16	multi-day trip to northern California in I believe	12:25:30
17	the October 2016 time period.	12:25:39
18	A. (In English) Yes.	12:25:48
19	Q. Can you tell me what the schedule	12:25:49
20	starting at page 44 reflects?	12:25:52
21	A. So it says that on day 1, CASPA annual	12:26:22
22	event starts, and Jinhua's people will attend. On	12:26:26
23	day 2, there was a job fair of Jinhua, and	12:26:42
24	I personally attended. And on day 3, after the	12:26:45
25	event completes, there were some tours arranged to	12:27:00

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Transcript of Stephen Chen

Conducted on July 10, 2018

80

1	visit the suppliers. So that's about it.	12:27:04
2	Q. And the suppliers that were going to be	12:27:18
3	visited included KLA, Lam Research, and Applied	12:27:21
4	Materials; correct?	12:27:24
5	A. Yes. So it's a one-day schedule.	12:27:31
6	Q. Mr. Chen, can I turn your direct	12:27:40
7	attention to the next page, which lists the names	12:27:42
8	of 12 individuals with positions at companies	12:27:47
9	including Jinhua, UMC, and then the final four are	12:27:52
10	with the -- it looks like the government of China.	12:27:56
11	A. Yes, they are also Jinhua's shareholders.	12:28:27
12	Q. Who is also Jinhua's shareholders?	12:28:30
13	A. So people from Jinjiang City and Quanzhou	12:28:46
14	City.	12:28:52
15	Q. So are all -- number 9, 10, 11 and 12 are	12:28:54
16	all Jinhua shareholders?	12:28:59
17	A. I think only two of them are Jinhua's	12:29:17
18	shareholders. The other two are their staff.	12:29:19
19	Q. Mr. Chen, did all 12 of these individuals	12:29:21
20	travel to the United States in October 2016 as	12:29:26
21	part of the CASPA event?	12:29:32
22	A. Yes, they all went. But the four did not	12:29:51
23	really attend. They were there to sort of look at	12:30:18
24	Jinhua's activities.	12:30:21
25	Q. The four government individuals is who	12:30:25

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Transcript of Stephen Chen

Conducted on July 10, 2018

81

1	you're referring to; correct, Mr. Chen?	12:30:27
2	A. Yes.	12:30:32
3	Q. Which of these individuals attended the	12:30:32
4	visits to the vendors?	12:30:37
5	A. So the four individuals from the	12:31:00
6	government were there to visit the vendors mainly.	12:31:01
7	They were not there to recruit people.	12:31:04
8	Q. Okay. Let me ask you this question.	12:31:08
9	Mr. Chen, did all four UMC employees	12:31:15
10	identified on Exhibit -- Exhibit 29 at Bates	12:31:17
11	number 45 attend the visits to the semiconductor	12:31:28
12	equipment vendors?	12:31:36
13	A. Are you asking about the four from UMC?	12:31:57
14	Q. Yes.	12:32:00
15	A. I'm not sure about Jeff, but I remember	12:32:15
16	the other three went.	12:32:18
17	Q. What about the four employees from	12:32:20
18	Jinhua? Did all of them attend the visits to the	12:32:23
19	semiconductor equipment vendors?	12:32:29
20	A. Individual number 1 and individual number	12:32:49
21	2 did not go because they didn't get the visa. So	12:32:51
22	supposedly it was the chairman who was to give	12:33:06
23	a speech at the CASPA event, but he couldn't come,	12:33:09
24	so it was Albert Wu who gave the speech.	12:33:12
25	Q. So in total, it was four UMC employees	12:33:17

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Transcript of Stephen Chen

Conducted on July 10, 2018

82

1	and two Jinhua employees at the CASPA event;	12:33:20
2	correct?	12:33:24
3	A. Yes. But it was mainly people from	12:33:52
4	Jinhua and people from UMC who attended CASPA and	12:33:57
5	participated in CASPA. People who were	12:34:00
6	individuals from the government were there just	12:34:07
7	looking and visiting. None of the four people	12:34:09
8	from the government made any speech at the CASPA	12:34:13
9	event.	12:34:16
10	Q. Understood.	12:34:21
11	[REDACTED]	12:34:26
12	[REDACTED]	12:34:35
13	[REDACTED]	12:34:40
14	[REDACTED]	12:34:58
15	[REDACTED] [REDACTED]	12:35:06
16	[REDACTED] [REDACTED]	12:35:18
17	[REDACTED] [REDACTED]	12:35:20
18	[REDACTED] [REDACTED]	12:35:25
19	[REDACTED] [REDACTED]	12:35:26
20	[REDACTED]	12:35:28
21	[REDACTED]	12:35:34
22	[REDACTED] [REDACTED]	12:35:46
23	[REDACTED]	12:35:51
24	[REDACTED] [REDACTED]	12:35:54
25	[REDACTED]	12:35:56

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Transcript of Stephen Chen

Conducted on July 10, 2018

83

1	[REDACTED]	12:36:07
2	[REDACTED]	12:36:10
3	[REDACTED]	12:36:13
4	Q. And the next column over, there's a name	12:36:14
5	"Wayne Lu, UMC Account Sales". Do you see that?	12:36:17
6	A. Yes.	12:36:30
7	Q. Is that a different Wayne than the Wayne	12:36:32
8	that we were -- you testified to earlier?	12:36:35
9	A. (In English) Different, different. He's	12:36:41
10	a sales engineer of Applied Materials who	12:36:42
11	responsible for UMC account. So it's an employee	12:36:44
12	of the Applied Materials.	12:36:49
13	Q. Understood. That's the Applied Materials	12:36:50
14	employee who's responsible for the UMC account.	12:36:55
15	[REDACTED]	12:37:09
16	[REDACTED]	12:37:14
17	[REDACTED]	12:37:20
18	[REDACTED]	12:37:24
19	[REDACTED]	12:37:48
20	[REDACTED]	12:37:50
21	[REDACTED]	12:38:40
22	[REDACTED]	12:38:40
23	[REDACTED]	12:38:40
24	[REDACTED]	12:38:42
25	[REDACTED]	12:38:47

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Transcript of Stephen Chen

Conducted on July 10, 2018

84

1	[REDACTED]	12:38:51
2	[REDACTED]	12:38:55
3	[REDACTED]	12:39:02
4	[REDACTED]	12:39:06
5	[REDACTED]	12:39:08
6	[REDACTED]	12:39:12
7	[REDACTED]	12:39:16
8	[REDACTED]	12:39:16
9	[REDACTED] [REDACTED]	12:39:17
10	[REDACTED]	12:39:20
11	[REDACTED]	12:39:23
12	[REDACTED] [REDACTED]	12:39:42
13	[REDACTED] [REDACTED]	12:39:56
14	[REDACTED] [REDACTED]	12:39:59
15	[REDACTED] [REDACTED]	12:40:03
16	[REDACTED]	12:40:16
17	[REDACTED]	12:40:18
18	[REDACTED] [REDACTED]	12:40:22
19	[REDACTED]	12:40:31
20	Q. Mr. Chen, let me ask you to think back to	12:40:33
21	your time when you were employed by Micron. Are	12:40:35
22	you familiar with Micron's series 110 products?	12:40:39
23	A. I knew about it, but I didn't have any	12:40:58
24	involvement. Because the technology was not	12:41:01
25	introduced or adopted until after I left Micron.	12:41:11

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Transcript of Stephen Chen

Conducted on July 10, 2018

85

1	MR. JOHNSON: I think we're past 12:30.	12:41:20
2	MR. MICHAEL: I'll be done in a second.	12:41:26
3	Do you know where the 110 series	12:41:28
4	products were being developed by Micron?	12:41:30
5	A. Based on my understanding, it was in	12:41:43
6	Japan.	12:41:45
7	Q. Do you know if any of the series 110	12:41:53
8	products were being developed in Boise, Idaho?	12:41:55
9	A. I think for the initial foundational	12:42:18
10	development of the product, it was done in Boise,	12:42:23
11	Idaho. But then in terms of technology	12:42:26
12	integration, it was done in Japan. That is my	12:42:29
13	understanding.	12:42:31
14	MR. MICHAEL: Why don't we take	12:42:42
15	a five-minute break, let me flip over some stuff	12:42:43
16	and see if I have any follow-up.	12:42:47
17	MR. JOHNSON: All right.	12:42:50
18	THE VIDEOGRAPHER: We are going off the	12:42:51
19	record. The time is 12:42 p.m.	12:42:51
20	(Break taken)	12:42:53
21	THE VIDEOGRAPHER: We are back on the	12:50:55
22	record. The time is 12:50 p.m.	12:50:56
23	BY MR. MICHAEL:	12:51:01
24	[REDACTED]	12:51:02
25	[REDACTED]	12:51:04

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Transcript of Stephen Chen

Conducted on July 10, 2018

86

1	[REDACTED]	12:51:14
2	[REDACTED]	12:51:29
3	[REDACTED] [REDACTED]	12:51:31
4	[REDACTED] [REDACTED]	12:51:37
5	[REDACTED] [REDACTED]	12:51:38
6	[REDACTED]	12:51:41
7	[REDACTED] [REDACTED]	12:51:43
8	[REDACTED] [REDACTED]	12:51:44
9	[REDACTED] [REDACTED]	12:51:49
10	[REDACTED] [REDACTED]	12:51:50
11	[REDACTED]	12:51:53
12	[REDACTED]	12:51:58
13	[REDACTED] [REDACTED]	12:52:11
14	[REDACTED]	12:52:18
15	[REDACTED] [REDACTED]	12:52:20
16	[REDACTED]	12:52:22
17	[REDACTED]	12:52:27
18	[REDACTED] [REDACTED] [REDACTED]	12:52:41
19	[REDACTED]	12:52:42
20	[REDACTED] [REDACTED]	12:52:50
21	[REDACTED] [REDACTED]	12:52:53
22	[REDACTED] [REDACTED]	12:53:04
23	[REDACTED]	12:53:06
24	[REDACTED]	12:53:12
25	[REDACTED] [REDACTED]	12:53:32

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Transcript of Stephen Chen

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87

1 [REDACTED] 12:53:35

2 [REDACTED] 12:53:42

3 [REDACTED] 12:53:45

4 [REDACTED] 12:53:48

5 [REDACTED] 12:53:53

6 [REDACTED] 12:54:09

7 Q. Mr. Chen, when you were employed by 12:54:21

8 Micron, are you aware that employees were able to 12:54:23

9 share and access information using various 12:54:27

10 file-sharing sites like SharePoint sites; correct? 12:54:33

11 A. Yes, I was aware of it. 12:54:52

12 Q. And you were aware that documents that 12:54:54

13 were used by employees all around the world at 12:54:57

14 Micron were stored at Micron's headquarters in 12:55:01

15 Boise, Idaho; correct? 12:55:06

16 A. I only know that the documents are 12:55:34

17 available on, for example, SharePoint or the agent 12:55:36

18 of SharePoint. But exactly where the documents 12:55:40

19 are stored, I don't know. 12:55:43

20 Q. Well, you testified earlier that you're 12:55:45

21 aware Fab 4 is located in Boise, Idaho; correct? 12:55:47

22 A. Yes. 12:55:58

23 Q. And if a document is related to Fab 4, is 12:55:58

24 it fair to say that you would understand that 12:56:03

25 document was likely stored in Boise, Idaho? 12:56:06

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Transcript of Stephen Chen

Conducted on July 10, 2018

88

1	MR. JOHNSON: Objection. Calls for	12:56:10
2	speculation and conjecture.	12:56:11
3	A. That, I am not clear. Basically in	12:56:32
4	Micron Taiwan, there were no people directly	12:56:44
5	involved in the technologies of Fab 4.	12:56:48
6	THE CHECK INTERPRETER: Sorry, the	12:56:54
7	witness's answer was, "I am not clear about that.	12:56:54
8	At Micron Taiwan, we did not have a contact window	12:56:59
9	with Fab 4."	12:57:04
10	A. We are a manufacturing site, and we have	12:57:16
11	a technology transfer team, but we don't have	12:57:21
12	direct contact with Fab 4.	12:57:24
13	BY MR. MICHAEL:	12:57:28
14	Q. Did employees at Micron Taiwan have	12:57:29
15	access to Fab 4 technical documentation?	12:57:32
16	A. Theoretically, no.	12:57:48
17	Q. Did they in fact have access to those	12:57:50
18	documents?	12:57:53
19	MR. JOHNSON: Objection. Speculation.	12:57:54
20	A. That, I'm not clear. We could access	12:58:13
21	information on SharePoint, but supposedly there	12:58:16
22	was no direct contact with Fab 4.	12:58:20
23	BY MR. MICHAEL:	12:58:23
24	Q. Based on your experience working at	12:58:24
25	Micron, if you were provided with a document	12:58:29

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Transcript of Stephen Chen

Conducted on July 10, 2018

89

1	related to Feb 4, would you understand the source	12:58:31
2	of that document and where it came from?	12:58:35
3	MR. JOHNSON: Objection. Calls for	12:58:37
4	speculation and conjecture.	12:58:39
5	A. Based on my understanding, the employees	12:59:13
6	only download documents from the website. So	12:59:16
7	SharePoint is a website. I don't think they would	12:59:18
8	know the source of the documents or where the	12:59:22
9	documents came from. And also, my supervisor is	12:59:25
10	located in Singapore. I also attended some	12:59:44
11	meetings where -- on SharePoint. So I only know	12:59:47
12	that the data came from SharePoint.	12:59:55
13	THE CHECK INTERPRETER: Sorry, correction	13:00:02
14	to the witness's answer's interpretation.	13:00:04
15	The witness's full answer was, "Based on	13:00:08
16	my understanding, the employees only download	13:00:13
17	documents from the website. SharePoint is	13:00:16
18	a possible location or source for the download.	13:00:19
19	I don't think they would know the source of the	13:00:24
20	documents or where the documents came from. For	13:00:27
21	example, my supervisor is located in Singapore.	13:00:29
22	I have attended many meetings with him, and the	13:00:31
23	information of the meetings was kept on	13:00:36
24	SharePoint. So he is from Singapore. I would not	13:00:38
25	know where the data from -- on SharePoint comes	13:00:43

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Transcript of Stephen Chen

Conducted on July 10, 2018

90

1	from."	13:00:45
2	BY MR. MICHAEL:	13:00:47
3	Q. Mr. Chen, during your time at Micron, did	13:00:48
4	you ever see a document relating to Fab 4?	13:00:50
5	A. (In English) Never.	13:01:00
6	Q. Never?	13:01:01
7	A. (In English) No, never.	13:01:02
8	Q. And if you had seen a document relating	13:01:04
9	to Fab 4, would you assume that document came from	13:01:05
10	Singapore?	13:01:09
11	MR. JOHNSON: Objection. Calls for	13:01:11
12	speculation and conjecture. If he hadn't seen any	13:01:12
13	documents, why are you speculating what he might	13:01:15
14	have thought if he had --	13:01:18
15	MR. MICHAEL: State your objection and	13:01:22
16	leave it at that, please.	13:01:23
17	A. (In English) I never see --	13:01:34
18	A. I have never seen any documents related	13:01:39
19	to Fab 4. It would be very hard for me to assume	13:01:43
20	that had I seen such a document, where the	13:01:53
21	document would be from.	13:01:55
22	BY MR. MICHAEL:	13:01:56
23	Q. Is one of the reasons that you've never	13:02:00
24	seen a document from Fab 4 is because documents	13:02:02
25	related to Fab 4 are likely stored in Boise,	13:02:04

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Transcript of Stephen Chen

Conducted on July 10, 2018

91

1	Idaho?	13:02:08
2	MR. JOHNSON: Objection. That calls for	13:02:10
3	speculation and conjecture.	13:02:12
4	A. Based on my understanding, in terms of	13:02:42
5	the technical support, our contact window is not	13:02:47
6	from Fab 4, so we hardly have any contact with	13:02:53
7	Fab 4.	13:02:57
8	BY MR. MICHAEL:	13:03:00
9	Q. What contact window are you referring to?	13:03:00
10	What does that mean?	13:03:02
11	A. Our technology transfer mainly came from	13:03:37
12	Japan, when we developed the 25 nanometer	13:03:41
13	technologies. So in terms of technology transfer,	13:03:45
14	Rexchip mostly worked with Japan. And after the	13:03:48
15	acquisition by Micron, Rexchip was not allowed to	13:03:51
16	have any direct contact with Micron's R&D	13:03:56
17	activities. So us as a fab does not have any	13:04:01
18	direct contact with the R&D department.	13:04:06
19	Q. Are you saying, Mr. Chen, that Micron	13:04:08
20	Taiwan employees had no reason to have Fab 4	13:04:11
21	documentation?	13:04:18
22	MR. JOHNSON: Objection. Misstates the	13:04:30
23	testimony.	13:04:34
24	A. So basically, the R&D department has the	13:04:57
25	authority to decide who to be on the list, to have	13:05:03

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USD-0351601

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Transcript of Stephen Chen

Conducted on July 10, 2018

92

1	access to the documents kept on SharePoint.	13:05:08
2	BY MR. MICHAEL:	13:05:14
3	Q. What R&D department?	13:05:15
4	THE CHECK INTERPRETER: Sorry, sorry,	13:05:17
5	sorry.	13:05:19
6	The witness's full answer was, "That is	13:05:20
7	true for technical-related issues. It is possible	13:05:22
8	that they would also have a taskforce and they	13:05:25
9	would need to access SharePoint. However, R&D	13:05:28
10	would decide who has authority to access those	13:05:32
11	documents on SharePoint. They would have a list.	13:05:35
12	If you are not one of the members, you would not	13:05:39
13	be on the list, and therefore be unable to know	13:05:42
14	what kind of documents are on SharePoint."	13:05:45
15	A. I am not sure who is on the member list.	13:05:58
16	At least I'm not on the list, so I have so	13:06:03
17	visibility in terms of which documents are	13:06:07
18	available on SharePoint.	13:06:09
19	BY MR. MICHAEL:	13:06:12
20	Q. When you refer to the R&D department as	13:06:12
21	having authority, where is that R&D department	13:06:15
22	located?	13:06:19
23	A. Fab 4, which is in Idaho.	13:06:32
24	Q. And in order for Micron Taiwan employees	13:06:39
25	to have access to Fab 4 technical documents, the	13:06:42

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Transcript of Stephen Chen

Conducted on July 10, 2018

93

1	R&D department of Fab 4 would have to authorize	13:06:47
2	that access?	13:06:51
3	A. Supposedly, yes. When I was with Micron,	13:07:11
4	our technologies did not come from Fab 4. So we	13:07:28
5	had no contact with Fab 4. But what happened	13:07:33
6	after I left Micron, I don't know.	13:07:37
7	Q. What about technical documents related to	13:07:50
8	Micron's series 110 products? Do you have any	13:07:52
9	knowledge where technical documents related to the	13:08:05
10	110 series products were stored at Micron?	13:08:07
11	A. I do not know, because it was until after	13:08:23
12	I left Micron that Micron adopted 110 series.	13:08:25
13	Q. To the best of your knowledge, does	13:08:45
14	Micron store technical documents regarding DRAM in	13:08:46
15	the United States?	13:08:52
16	A. Based on my understanding, I believe that	13:09:08
17	the DRAM technologies of Micron are in Japan.	13:09:11
18	A. (In English) Because we always choose	13:09:14
19	technologies from Japan, so for most of our	13:09:14
20	employees, we see the technology -- of course,	13:09:29
21	directly, we contact the Japan site.	13:09:32
22	Q. When you say that Micron's DRAM	13:09:35
23	technologies are in Japan, are you referring to	13:09:38
24	Micron Technology, Inc. DRAM technology, or are	13:09:42
25	you referring to Micron Taiwan DRAM technology?	13:09:48

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Transcript of Stephen Chen

Conducted on July 10, 2018

94

1	A. Micron Japan still belongs to Micron.	13:10:20
2	THE MAIN INTERPRETER: Should I translate	13:10:33
3	the question again?	13:10:34
4	THE CHECK INTERPRETER: That was the full	13:10:35
5	answer.	13:10:36
6	BY MR. MICHAEL:	13:10:38
7	Q. Is it your understanding that all Micron	13:10:38
8	technology related to DRAM is stored in Japan?	13:10:41
9	A. The technologies are downloaded from the	13:11:14
10	servers of the company onto our computer. So it's	13:11:18
11	really hard to tell where exactly the source is.	13:11:22
12	And the site that we contact is mainly in Japan,	13:11:27
13	and basically -- I'm talking about, for example,	13:11:31
14	the mailing address is always Japan.	13:11:35
15	THE CHECK INTERPRETER: Sorry, my	13:11:39
16	rendition would be a bit different.	13:11:40
17	The witness's answer was, "We would	13:11:42
18	download the documents from the website.	13:11:50
19	Basically what we do is we connect our PCs to the	13:11:53
20	company's server, but we do not know where those	13:11:56
21	servers connect to. When I talked about Japan,	13:11:59
22	I was referring to, for example, mail addresses,	13:12:02
23	and they appear to be from Japan."	13:12:05
24	BY MR. MICHAEL:	13:12:09
25	Q. When you're referring to mail addresses,	13:12:09

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Transcript of Stephen Chen

Conducted on July 10, 2018

95

1	are you referring to URLs? Is that what you mean?	13:12:12
2	A. (In English) URL? No idea. URL just --	13:12:16
3	Q. What do you mean by "mailing addresses"?	13:12:44
4	THE COURT REPORTER: Sorry, I didn't get	13:12:44
5	the translation.	13:12:44
6	MR. MICHAEL: My apologies.	13:12:44
7	THE MAIN INTERPRETER: He actually spoke	13:12:44
8	English.	13:12:44
9	"So for URL, I don't know what URL is."	13:12:44
10	A. When we saw the mail address, it says	13:12:59
11	Japan or .jp, and it appeared to us to be	13:13:03
12	Japanese, and we didn't really think where they	13:13:07
13	exactly link to.	13:13:11
14	BY MR. MICHAEL:	13:13:17
15	Q. Are you familiar with the SharePoint site	13:13:17
16	or password-protected Micron site called	13:13:21
17	collab.micron.com?	13:13:26
18	A. I have no clarity. I was not one of the	13:13:48
19	members, so for most of the times, I have no	13:13:51
20	access.	13:13:54
21	Q. You're aware that Micron Technology	13:13:55
22	Inc.'s headquarters are in Boise, Idaho?	13:14:00
23	MR. JOHNSON: Objection. Asked and	13:14:08
24	answered.	13:14:09
25	A. Yes, I am aware of it.	13:14:17

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Transcript of Stephen Chen

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96

1	BY MR. MICHAEL:	13:14:24
2	Q. And to the best of your knowledge, the	13:14:25
3	intellectual property of the various Micron	13:14:27
4	entities are -- is owned by Micron Technology Inc.	13:14:29
5	Is that correct?	13:14:34
6	MR. JOHNSON: Objection. Calls for	13:14:34
7	speculation and conjecture. Also a legal	13:14:37
8	conclusion.	13:14:39
9	A. I am not clear about it.	13:15:00
10	BY MR. MICHAEL:	13:15:06
11	Q. Have you ever accessed a Micron	13:15:07
12	password-protected website since you left Micron?	13:15:09
13	A. (In English) Never.	13:15:22
14	A. I have never accessed.	13:15:26
15	Q. Are you aware of any UMC employee	13:15:31
16	accessing a Micron password-protected website?	13:15:34
17	A. (In English) I have no idea.	13:15:47
18	Q. And in your entire time while you've been	13:15:51
19	employed at UMC, you have never seen any Micron	13:15:53
20	technical documents in the possession of UMC or	13:15:58
21	UMC employees; is that correct?	13:16:02
22	A. I have never seen any in this entire time	13:16:19
23	being employed by UMC.	13:16:24
24	MR. MICHAEL: I have no further	13:16:29
25	questions.	13:16:31

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Transcript of Stephen Chen

Conducted on July 10, 2018

97

1	MR. JOHNSON: I have some questions.	13:16:32
2	EXAMINATION BY MR. JOHNSON:	13:16:33
3	Q. First, did you work for Rexchip?	13:16:38
4	A. (In English) Yes.	13:16:40
5	A. Yes.	13:16:42
6	Q. What technology did you develop while	13:16:43
7	working at Rexchip?	13:16:45
8	A. We had technology transfer from Japan, so	13:16:58
9	we transferred from 70 nanometer to 25 nanometer.	13:17:01
10	Q. And are you referring now to DRAM	13:17:07
11	technology?	13:17:09
12	A. Yes.	13:17:12
13	Q. And was this DRAM technology developed in	13:17:14
14	Japan?	13:17:19
15	A. Yes.	13:17:24
16	Q. And was the company in Japan who	13:17:25
17	developed the technology Elpida?	13:17:28
18	MR. MICHAEL: Objection. Calls for	13:17:33
19	speculation.	13:17:35
20	A. So when we transferred to 25 nanometer,	13:17:57
21	it was 2013. And before that, the company was	13:18:02
22	called Elpida. It was until August 2013 that	13:18:05
23	Micron acquired Elpida.	13:18:10
24	BY MR. JOHNSON:	13:18:14
25	Q. All right. When did you work with	13:18:14

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Transcript of Stephen Chen

Conducted on July 10, 2018

98

1	Elpida, for what period of time?	13:18:16
2	THE CHECK INTERPRETER: "(Chinese	13:18:29
3	spoken)".	13:18:29
4	A. When I worked for Powerchip, I began to	13:18:31
5	work with Elpida.	13:18:36
6	BY MR. JOHNSON:	13:18:39
7	Q. And you began working for Powerchip when?	13:18:40
8	A. 1996.	13:18:49
9	Q. And what -- what work did you do with	13:18:52
10	Elpida while you were with Powerchip?	13:18:57
11	A. Back then, I was the VP of Powerchip, so	13:19:28
12	I was involved in technology transfer. I was also	13:19:31
13	involved in yield improvement.	13:19:37
14	Q. What was Elpida's business when you were	13:19:40
15	working at Powerchip, if you know?	13:19:42
16	A. It was a company involved in DRAM R&D,	13:19:56
17	sales, and manufacturing.	13:20:02
18	Q. Did Elpida assist Powerchip with DRAM	13:20:03
19	R&D?	13:20:08
20	A. Mostly about technology transfer.	13:20:19
21	Q. Okay. And did you -- when you were with	13:20:21
22	Rexchip, did you work with Elpida?	13:20:24
23	A. Yes.	13:20:31
24	Q. And did that involve technology transfer	13:20:32
25	too?	13:20:35

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Transcript of Stephen Chen

Conducted on July 10, 2018

99

1	A. Back then, I was the president of the	13:20:51
2	company, so I was mainly in charge of the	13:20:54
3	milestone. In terms of the technology transfer	13:20:57
4	and the details of the technology transfer, we had	13:21:00
5	other people in charge of those.	13:21:03
6	Q. Okay. Now, when you started at UMC at	13:21:07
7	the end of 2015, I believe you testified that you	13:21:13
8	were involved with making a decision about whether	13:21:19
9	to go into the DRAM development; is that correct?	13:21:22
10	A. Yes.	13:21:45
11	Q. Do -- can you tell us what benchmarking	13:21:48
12	is?	13:21:51
13	A. It was an internal discussion back then	13:22:13
14	regarding technology development. In the market,	13:22:18
15	there are three main DRAM companies. So we were	13:22:21
16	to analyze their technologies in order to identify	13:22:25
17	the future direction for our technology	13:22:29
18	developments.	13:22:33
19	Q. And which companies' technology did you	13:22:33
20	analyze?	13:22:40
21	A. So mainly about the three DRAM companies,	13:22:54
22	and we got information from TechInsight [sic] for	13:22:57
23	our initial analysis.	13:23:03
24	Q. All right. And what type of information	13:23:06
25	did you get from TechInsights?	13:23:09

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Transcript of Stephen Chen

Conducted on July 10, 2018

100

1	A. They gave us information regarding design	13:23:26
2	rule, design structure, and cell layout.	13:23:30
3	Q. And was one of the companies you	13:23:35
4	benchmarked Samsung?	13:23:39
5	A. Yes, of course. Samsung is the leader in	13:23:56
6	this technology, so Samsung is our first priority	13:24:00
7	when it comes to benchmarking.	13:24:05
8	Q. Did you benchmark Hynix?	13:24:06
9	A. Yes. So besides getting technical	13:24:12
10	documents from TechInsight, we also got chips in	13:24:26
11	the market to do reverse-engineering.	13:24:30
12	Q. We'll talk about that. But you	13:24:33
13	benchmarked Hynix?	13:24:35
14	A. (In English) Yes.	13:24:38
15	Q. And did you use TechInsights to benchmark	13:24:44
16	Micron?	13:24:49
17	A. Yes. All three is -- all three are	13:24:54
18	included in the information.	13:24:58
19	Q. And did TechInsights give you reports on	13:25:00
20	the technologies of all three?	13:25:05
21	A. Yes.	13:25:19
22	Q. All right. Did you -- you indicated that	13:25:20
23	you did some reverse-engineering.	13:25:21
24	A. Yes.	13:25:26
25	Q. So explain to us what reverse engineering	13:25:27

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Transcript of Stephen Chen

Conducted on July 10, 2018

101

1	is.	13:25:31
2	A. What TechInsight offered was technical	13:25:47
3	directions without detailed analysis. And also it	13:25:50
4	was just a commercial report. So there were a lot	13:25:58
5	of our technical interests that could not be	13:26:01
6	addressed in those reports. So in order for us to	13:26:05
7	get detailed analysis, we had to do	13:26:19
8	reverse-engineering. That was why we got chips	13:26:21
9	for reverse-engineering. Based on my	13:26:25
10	understanding, UMC had great abilities in terms of	13:26:31
11	MA, material analysis, as well as FA, failure	13:26:36
12	analysis labs.	13:26:43
13	Q. Did you reverse-engineer the Samsung	13:26:44
14	chips?	13:26:46
15	A. Yes.	13:26:49
16	Q. And were these DRAM chips?	13:26:50
17	A. Yes.	13:26:54
18	Q. And do you recall what the -- if they	13:26:55
19	were 30-nanometers-or-less chips?	13:26:58
20	A. Based on my understanding, they call that	13:27:12
21	2X, 2Z.	13:27:14
22	Q. And what's the nanometer?	13:27:17
23	A. (In English) 2X -- this is something like	13:27:20
24	28 or 25 nanometer. 2Z is something like 21	13:27:20
25	nanometer.	13:27:34

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Transcript of Stephen Chen

Conducted on July 10, 2018

102

1	[REDACTED]	13:27:35
2	[REDACTED]	13:27:42
3	[REDACTED]	13:27:43
4	[REDACTED]	13:27:47
5	[REDACTED]	13:27:58
6	[REDACTED]	13:28:02
7	[REDACTED]	13:28:32
8	[REDACTED]	13:28:36
9	[REDACTED]	13:28:38
10	[REDACTED]	13:28:43
11	[REDACTED]	13:28:46
12	[REDACTED]	13:28:52
13	[REDACTED]	13:28:56
14	[REDACTED]	13:28:57
15	[REDACTED]	13:29:01
16	[REDACTED]	13:29:06
17	[REDACTED]	13:29:11
18	[REDACTED]	13:29:15
19	[REDACTED]	13:29:21
20	[REDACTED]	13:29:46
21	[REDACTED]	13:29:49
22	[REDACTED]	13:29:52
23	[REDACTED]	13:29:59
24	[REDACTED]	13:30:00
25	[REDACTED]	13:30:02

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USD-0351612

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Transcript of Stephen Chen

Conducted on July 10, 2018

103

1	[REDACTED]	13:30:13
2	Q. Now, you were a former executive at	13:30:16
3	Micron; is that correct?	13:30:20
4	A. Yes.	13:30:25
5	Q. Now, in the 2016 timeframe, did you have	13:30:26
6	a policy about hiring Micron employees?	13:30:37
7	A. You mean when I was with UMC?	13:30:52
8	Q. Yes.	13:31:01
9	[REDACTED]	13:31:18
10	[REDACTED]	13:31:23
11	[REDACTED]	13:31:26
12	[REDACTED]	13:31:32
13	[REDACTED]	13:31:36
14	[REDACTED]	13:31:54
15	[REDACTED]	13:31:58
16	[REDACTED]	13:32:01
17	[REDACTED]	13:32:04
18	[REDACTED]	13:32:08
19	Q. So you did hire some individuals from	13:32:12
20	Micron; correct?	13:32:18
21	A. Only two, six months after I joined --	13:32:32
22	within the six months after I joined UMC.	13:32:34
23	Q. And who were they?	13:32:37
24	A. JT Ho, and Neil Lee.	13:32:46
25	Q. Did you contact Mr. Ho about coming to	13:32:50

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Transcript of Stephen Chen

Conducted on July 10, 2018

104

1	work?	13:32:52
2	A. Mr. Ho came to me. He approached me,	13:33:01
3	saying that he would like to work with me.	13:33:04
4	Q. And what about Mr. Lee? Did you contact	13:33:07
5	him?	13:33:10
6	A. Mr. Lee came to me. Mr. Lee approached	13:33:15
7	me. So both of them approached me.	13:33:19
8	Q. Were you contacted by other Micron	13:33:21
9	employees about possible work at UMC?	13:33:23
10	A. Basically it was them who approached me	13:33:42
11	so that we had this contact. So I used to be the	13:33:47
12	president of Micron, and usually it was the	13:34:13
13	directors of Micron who had direct work relations	13:34:16
14	with me at Micron. But those who approached me	13:34:20
15	afterwards were mostly mid-level or low-level	13:34:23
16	managers with whom I had very little work	13:34:27
17	relations at Micron or direct work relations at	13:34:30
18	Micron. They came to me because they were not	13:34:34
19	happy at Micron.	13:34:36
20	Q. And how many people came to you?	13:34:41
21	A. You mean as of now?	13:34:43
22	Q. Yeah, through today.	13:34:46
23	A. Less than 20. Slightly more than 10,	13:34:48
24	maybe a dozen. And four or five of them went to	13:34:54
25	a different company after Micron, before they came	13:35:09

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Transcript of Stephen Chen

Conducted on July 10, 2018

105

1	to me. So those four or five did not come to UMC	13:35:11
2	right after Micron.	13:35:16
3	[REDACTED]	13:35:18
4	[REDACTED]	13:35:25
5	[REDACTED]	13:35:32
6	[REDACTED]	13:35:34
7	[REDACTED]	13:35:35
8	[REDACTED]	13:35:42
9	[REDACTED]	13:35:50
10	[REDACTED]	13:35:53
11	[REDACTED]	13:35:58
12	[REDACTED]	13:35:58
13	from Micron?	13:36:01
14	MR. MICHAEL: Objection. Calls for	13:36:06
15	speculation.	13:36:07
16	A. As I said earlier -- as I said earlier,	13:36:10
17	less than 20, with myself included.	13:36:11
18	BY MR. JOHNSON:	13:36:19
19	Q. Did you ever have a plan to raid Micron	13:36:19
20	to develop your DRAM technology?	13:36:24
21	A. No, I have never had such a thought.	13:36:36
22	MR. JOHNSON: Nothing further.	13:36:41
23	MR. MICHAEL: I have a couple of	13:36:42
24	follow-ups.	13:36:44
25	FURTHER EXAMINATION BY MR. MICHAEL:	13:36:44

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Transcript of Stephen Chen

Conducted on July 10, 2018

106

1	Q. Mr. Chen, you said that TechInsights	13:36:48
2	during your efforts to do product comparisons	13:36:50
3	provided UMC with technical documentation,	13:36:53
4	including design rules, design structures and cell	13:36:56
5	layouts; is that correct?	13:36:59
6	A. Yes.	13:37:19
7	Q. Did TechInsights provide UMC with any	13:37:21
8	Micron technical documents?	13:37:25
9	A. TechInsight creates a lot of chip	13:37:55
10	reverse-engineering reports, including for Hynix,	13:37:58
11	Samsung, and Micron. So they are all very	13:38:03
12	commercial reports.	13:38:09
13	Q. Did TechInsights provide UMC with any	13:38:10
14	Micron design rules?	13:38:12
15	A. In TechInsights' reports, it shows part	13:38:25
16	of the design rules, but not all.	13:38:30
17	Q. Do you have an understanding where	13:38:32
18	TechInsights obtained Micron design rules from?	13:38:34
19	A. So from the reverse-engineering point of	13:38:58
20	view, you get to see the dimension of the	13:39:00
21	structure.	13:39:02
22	A. (In English) That's a part of our design	13:39:03
23	rule.	13:39:03
24	Q. But that's not the design rule, that's	13:39:08
25	just the parameter that you're able to observe	13:39:11

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Transcript of Stephen Chen

Conducted on July 10, 2018

107

1	from your reverse-engineering; correct?	13:39:14
2	A. That is correct. However, UMC does	13:39:38
3	possess some design rule capabilities, so by	13:39:41
4	looking at the documents in the development	13:39:45
5	process and reverse-engineering process, we're	13:39:49
6	able to complete the design rule.	13:39:51
7	Q. So I want to ignore commercial reports	13:39:53
8	that TechInsights provided to you. Besides	13:40:03
9	commercial reports, did TechInsights provide UMC	13:40:06
10	with any Micron technical documents?	13:40:09
11	A. No.	13:40:29
12	Q. You also testified that UMC decided not	13:40:30
13	to reverse-engineer Micron DRAM chips; is that	13:40:33
14	correct?	13:40:38
15	A. We had such direction identified in the	13:40:57
16	team discussions.	13:41:01
17	Q. Did UMC have TechInsights	13:41:04
18	reverse-engineer any Micron chips?	13:41:08
19	A. (In English) No.	13:41:22
20	Q. Has UMC ever conducted	13:41:22
21	reverse-engineering of Micron DRAM chips, aside	13:41:25
22	from -- let me ask the question again.	13:41:29
23	Has UMC ever conducted	13:41:33
24	reverse-engineering of Micron DRAM chips?	13:41:35
25	A. I suppose not.	13:41:58

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Transcript of Stephen Chen

Conducted on July 10, 2018

108

1	Q. Do you know one way or the other?	13:42:03
2	A. Supposedly no.	13:42:15
3	Q. What do you mean, "Supposedly no"?	13:42:18
4	A. We bought some Micron chips in the	13:42:54
5	market, and someone later advised us not to do	13:42:56
6	reverse-engineering, so I didn't do it. But then	13:42:59
7	was there any further analysis? I am not sure.	13:43:04
8	I handed the Micron chips to the analysis	13:43:14
9	department, and then I don't know what happened to	13:43:19
10	those chips. I'm not sure if the analysis	13:43:21
11	department destroyed the chips or not.	13:43:26
12	Q. Who did you hand the chips to? What was	13:43:28
13	the name of the individual?	13:43:31
14	A. The AVP of the process development	13:43:43
15	department was SF Tzou.	13:43:47
16	Q. To the best of your knowledge, UMC has	13:43:54
17	not reverse-engineered Micron DRAM chips; correct?	13:43:58
18	A. That is correct. We decided on purpose	13:44:15
19	not to reverse-engineer Micron chips.	13:44:17
20	Q. You also testified that one of the	13:44:20
21	reasons you -- UMC did not reverse-engineer Micron	13:44:22
22	chips is that there were some concerns regarding	13:44:27
23	Micron. What concerns?	13:44:32
24	A. We decided to go for the structure of	13:45:03
25	Samsung, so in the first place we did not need too	13:45:07

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Transcript of Stephen Chen

Conducted on July 10, 2018

109

1	much Micron technology direction. (Chinese	13:45:10
2	spoken) --	13:45:16
3	Q. Let me stop you there. What were UMC's	13:45:17
4	concerns about Micron, if any?	13:45:22
5	A. We have decided not to go for the	13:45:52
6	technology direction and layout of the - Micron,	13:45:54
7	so if we discussed Micron technologies, there	13:45:58
8	would be too many discussions, and too many	13:46:04
9	discussions were not a good thing for technology	13:46:07
10	development.	13:46:10
11	Q. Those were the concerns that your legal	13:46:12
12	counsel provided to UMC?	13:46:15
13	MR. JOHNSON: Objection. I instruct you	13:46:25
14	not to answer on the ground of attorney-client	13:46:27
15	privilege to the extent that it relates to	13:46:30
16	communications with legal counsel.	13:46:34
17	MR. MICHAEL: Okay, I'm not going to	13:46:49
18	debate this issue with you on the record right now	13:46:50
19	in the interests of time. I will tell you that it	13:46:53
20	was your question and the witness's testimony that	13:46:55
21	invoked the advice of counsel for decision-making	13:46:57
22	that was made. So in my view, it's fair game, but	13:47:01
23	we can deal with that at a different time.	13:47:04
24	MR. JOHNSON: I disagree, but we can.	13:47:07
25	MR. MICHAEL: Yes.	13:47:10

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Transcript of Stephen Chen

Conducted on July 10, 2018

110

1	MR. JOHNSON: And will.	13:47:11
2	BY MR. MICHAEL:	13:47:12
3	Q. You also testified that you've hired less	13:47:12
4	than 20 individuals from Micron; correct?	13:47:15
5	A. (In English) Yes.	13:47:26
6	Q. You mentioned JT Ho?	13:47:27
7	A. Mm'hm.	13:47:30
8	Q. When did JT Ho start working on the	13:47:31
9	UMC-Jinhua joint development DRAM project?	13:47:37
10	A. JT joined UMC, I think it was mid or late	13:48:07
11	November of 2015. And it was the end of December	13:48:13
12	that we began discussions regarding the joint	13:48:17
13	project.	13:48:21
14	Q. And what about Mr. Neil Lee, when did he	13:48:23
15	start working on the joint DRAM project?	13:48:29
16	A. Roughly also after December.	13:48:40
17	Q. Mr. Kenny Wang is also an individual that	13:48:47
18	is a former Micron employee that was hired into	13:48:52
19	your group at UMC; correct?	13:48:55
20	A. Yes.	13:49:06
21	Q. Are you aware that Mr. JT Ho and Mr Kenny	13:49:13
22	Wang have been indicted by the Taiwan Prosecutors	13:49:17
23	Office for criminal trade secret theft?	13:49:22
24	A. Yes, I learned about it last year on the	13:49:44
25	news report.	13:49:48

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Transcript of Stephen Chen

Conducted on July 10, 2018

111

1	Q. Are you also aware that one of the bases	13:49:49
2	for the indictment is that Mr. Ho and Mr. Wang	13:49:53
3	brought to them -- brought to UMC a substantial	13:49:58
4	number of Micron confidential documents? Are you	13:50:05
5	aware of that?	13:50:12
6	A. I didn't know until the investigation	13:50:30
7	department came for the investigation.	13:50:34
8	Q. Did you ever conduct an investigation on	13:50:41
9	how it is that JT Ho was in possession of Micron	13:50:44
10	confidential documents while employed at UMC?	13:50:51
11	A. I did not know that JT Ho had Micron	13:51:08
12	confidential documents, so I did not conduct	13:51:13
13	an investigation.	13:51:15
14	Q. Is JT Ho still employed at UMC?	13:51:17
15	A. Yes.	13:51:24
16	Q. And you're employed at UMC; correct?	13:51:26
17	A. Yes.	13:51:31
18	Q. And JT Ho still reports to you; correct?	13:51:32
19	A. JT Ho is not reporting to me. He used to	13:51:48
20	be involved in technology integration, but now	13:51:51
21	he's transferred to a different department.	13:51:54
22	Q. Does he work on the DRAM project?	13:51:57
23	A. (In English) Now?	13:52:05
24	A. Are you asking now?	13:52:07
25	Q. Yes.	13:52:08

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112

1	A. He is involved in the discussions of	13:52:13
2	product testing.	13:52:16
3	Q. Have you ever asked JT Ho what the source	13:52:17
4	was of the Micron documents that he possessed	13:52:21
5	while at UMC?	13:52:24
6	A. No, I have never asked him.	13:52:37
7	Q. Have you ever -- ever asked somebody at	13:52:40
8	UMC to investigate the source of Micron documents	13:52:44
9	that were in JT Ho's possession?	13:52:48
10	A. We didn't know about those documents	13:53:06
11	until the investigation department came for	13:53:09
12	an investigation.	13:53:11
13	Q. And my question to you is, have you,	13:53:14
14	Mr. Chen, ever asked somebody at UMC to	13:53:16
15	investigate the source of Micron confidential	13:53:19
16	documents that JT Ho possessed?	13:53:24
17	A. No.	13:53:39
18	Q. Have you ever asked Kenny Wang what the	13:53:43
19	source was of the Micron documents that he	13:53:45
20	possessed while at UMC?	13:53:48
21	A. I did not know that Kenny Wang had those	13:54:01
22	documents. I did not know that Kenny Wang had	13:54:05
23	those documents until the investigation, and then	13:54:11
24	after the investigation, Kenny Wang was let go by	13:54:14
25	the company.	13:54:19

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113

1	Q. So is it correct that you've never asked	13:54:20
2	Kenny Wang what the source was of the Micron	13:54:23
3	documents in his possession?	13:54:26
4	A. No.	13:54:33
5	THE CHECK INTERPRETER: I'm sorry, it	13:54:36
6	wasn't clear whether the witness meant "No, I've	13:54:40
7	never asked" or "Yes, you're correct". My	13:54:42
8	interpretation would be "It is correct".	13:54:48
9	BY MR. MICHAEL:	13:54:52
10	Q. Let me ask the question again.	13:54:52
11	Have you ever asked Kenny Wang what the	13:54:54
12	source was of the Micron documents in his	13:54:56
13	possession?	13:54:59
14	A. No.	13:55:07
15	MR. JOHNSON: Done?	13:55:11
16	MR. MICHAEL: No more. I'm all good.	13:55:13
17	THE COURT REPORTER: Any stipulations?	13:55:17
18	MR. MICHAEL: Same ones as yesterday?	13:55:21
19	MR. JOHNSON: Same ones as yesterday.	13:55:23
20	Same answer.	13:55:25
21	THE VIDEOGRAPHER: We are going off the	13:55:26
22	record. The time is 1:55 p.m.	13:55:27
23	(Off the record at 1:55 p.m)	13:55:30
24		
25		

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114

CERTIFICATE OF SHORTHAND REPORTER

I, JADE K. KING, Accredited Shorthand Reporter, the officer before whom the foregoing deposition was taken, do hereby certify that the foregoing transcript is a true and correct record of the testimony given; that said testimony was taken by me stenographically and thereafter reduced to typewriting under my supervision; that reading and signing was not requested; and that I am neither counsel for or related to, nor employed by any of the parties to this case and have no interest, financial or otherwise, in its outcome.

IN WITNESS WHEREOF, I have hereunto set my hand this 15th day of July 2018.



Jade K. King

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115

A			
<b>a-c-m-e</b>	<b>accessed</b>	<b>addresses</b>	6:11, 55:2,
26:20	96:11, 96:14	94:22, 94:25,	59:25
<b>a-l-l-e-n</b>	<b>accessing</b>	95:3	<b>agreement</b>
36:2, 36:7	96:16	<b>administer</b>	2:12, 56:19,
<b>abilities</b>	<b>according</b>	6:5	56:24, 57:4,
101:10	30:22, 60:19,	<b>admissibility</b>	57:6, 57:9,
<b>able</b>	74:23, 74:25	6:7	57:14, 57:18,
44:25, 46:16,	<b>account</b>	<b>adopted</b>	59:13, 59:16,
46:21, 68:16,	83:5, 83:11,	84:25, 93:12	60:1, 60:12,
76:20, 84:5,	83:14	<b>advice</b>	63:8, 63:11,
87:8, 106:25,	<b>accredited</b>	102:7, 109:21	66:4, 79:1
107:6	114:2	<b>advised</b>	<b>al</b>
<b>about</b>	<b>acer</b>	108:5	5:5
39:19, 41:21,	17:4, 17:7,	<b>after</b>	<b>albert</b>
50:20, 50:22,	17:11	19:21, 22:13,	67:23, 81:24
51:13, 63:4,	<b>acme</b>	22:21, 22:25,	<b>all</b>
63:23, 64:4,	26:18, 27:1,	23:11, 25:18,	4:1, 6:16,
69:3, 69:14,	27:3	26:13, 28:20,	11:12, 19:24,
70:17, 70:18,	<b>acquire</b>	29:19, 36:19,	22:9, 38:5,
70:19, 72:16,	31:3	40:22, 42:3,	42:24, 45:7,
75:23, 80:1,	<b>acquired</b>	42:13, 45:2,	53:1, 53:3,
81:13, 81:15,	32:14, 32:25,	46:13, 46:14,	58:4, 59:4,
81:17, 83:1,	33:20, 97:23	46:20, 46:21,	63:24, 64:1,
84:23, 86:13,	<b>acquisition</b>	47:4, 79:24,	65:10, 67:7,
86:20, 86:23,	32:17, 33:3,	84:25, 91:14,	69:7, 71:2,
86:25, 88:7,	33:5, 91:15	93:6, 93:11,	80:15, 80:16,
93:7, 94:13,	<b>activities</b>	103:21, 103:22,	80:19, 80:22,
94:21, 96:9,	48:11, 68:15,	104:25, 105:2,	81:9, 81:18,
98:20, 99:8,	68:19, 80:24,	110:16, 112:24	85:17, 87:13,
99:21, 100:12,	91:17	<b>afterwards</b>	94:7, 97:25,
102:8, 103:6,	<b>activity</b>	104:15	99:24, 100:17,
103:25, 104:4,	17:25	<b>again</b>	100:20, 100:22,
104:9, 105:5,	<b>actually</b>	21:5, 24:11,	105:12, 106:11,
105:8, 105:9,	7:19, 95:7	25:10, 27:9,	106:16, 113:16
109:4, 110:14,	<b>add</b>	28:17, 55:25,	<b>allen</b>
110:24, 112:10	68:7, 68:10,	64:7, 85:25,	35:24, 36:1,
<b>above</b>	68:24, 69:10	94:3, 102:3,	36:7
54:25	<b>added</b>	107:22, 113:10	<b>allocated</b>
<b>acceptable</b>	68:12	<b>agenda</b>	68:22
8:21	<b>additional</b>	67:20	<b>allow</b>
<b>access</b>	22:14	<b>agent</b>	26:9
87:9, 88:15,	<b>address</b>	87:17	<b>allowed</b>
88:17, 88:20,	7:5, 7:9, 7:11,	<b>ago</b>	46:8, 48:16,
92:1, 92:9,	7:12, 7:13,	17:22, 22:12,	91:15
92:10, 92:25,	7:19, 94:14,	54:22, 54:23	<b>almost</b>
93:2, 95:20	95:10	<b>agree</b>	12:18, 28:18
	<b>addressed</b>	6:6	<b>already</b>
	101:6	<b>agreed</b>	52:19, 62:1,
		6:9, 6:10,	

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116

84:16 <b>also</b> 3:30, 5:19, 7:22, 9:12, 10:15, 12:6, 16:10, 20:21, 24:2, 24:7, 35:7, 39:8, 40:1, 44:8, 53:6, 53:7, 53:8, 53:9, 62:2, 72:7, 74:21, 75:16, 80:11, 80:12, 87:3, 89:9, 89:10, 92:8, 96:7, 98:12, 100:10, 101:3, 107:12, 108:20, 110:3, 110:16, 110:17, 111:1 <b>altogether</b> 75:17 <b>always</b> 19:4, 28:15, 93:18, 94:14 <b>american</b> 71:22 <b>amount</b> 8:17 <b>analysis</b> 25:9, 25:13, 25:16, 99:23, 101:3, 101:7, 101:11, 101:12, 102:15, 108:7, 108:8, 108:10 <b>analyze</b> 99:16, 99:20 <b>angle</b> 84:18 <b>announcement</b> 42:12 <b>annual</b> 79:21 <b>another</b> 41:18, 53:9, 56:9, 58:16,	58:19, 59:1, 75:16, 75:22 <b>answer</b> 8:12, 8:13, 8:25, 48:20, 48:22, 48:23, 49:19, 51:21, 62:22, 78:5, 78:16, 88:7, 89:15, 92:6, 94:5, 94:17, 109:14, 113:20 <b>answer's</b> 89:14 <b>answered</b> 58:5, 95:24 <b>answers</b> 4:2, 6:17, 8:10, 8:20, 26:9, 38:5 <b>any</b> 9:5, 10:14, 12:23, 13:1, 14:4, 15:8, 18:6, 22:14, 22:17, 25:15, 33:6, 37:4, 38:16, 44:11, 47:9, 48:20, 60:13, 70:6, 70:24, 73:22, 75:20, 77:15, 78:21, 82:8, 84:23, 85:7, 85:16, 90:12, 90:18, 91:6, 91:16, 91:17, 93:8, 96:15, 96:19, 96:22, 106:7, 106:13, 107:10, 107:18, 108:7, 109:4, 113:17, 114:11 <b>anybody</b> 13:5 <b>anyone</b> 69:22 <b>anything</b> 66:16	<b>anywhere</b> 9:7, 70:9 <b>apologies</b> 95:6 <b>appear</b> 94:23 <b>appeared</b> 95:11 <b>appears</b> 67:13, 79:15 <b>applied</b> 49:9, 50:11, 53:5, 58:2, 58:12, 58:14, 80:3, 82:12, 82:20, 83:10, 83:12, 83:13, 83:24, 84:10, 84:18 <b>appoint</b> 29:21 <b>appointed</b> 30:6 <b>appointment</b> 55:2, 55:8 <b>appreciation</b> 84:2, 84:6, 84:16 <b>approached</b> 71:16, 103:11, 104:2, 104:6, 104:7, 104:10, 104:14 <b>approval</b> 42:13, 46:15, 48:13 <b>approve</b> 51:12 <b>approved</b> 55:22, 60:4, 60:5 <b>approximately</b> 16:12, 19:1, 19:6, 62:4, 69:10, 69:15, 70:12, 70:15 <b>approximation</b> 62:8	<b>april</b> 72:3 <b>aptd</b> 83:17, 83:20, 83:22 <b>army</b> 23:19 <b>around</b> 77:1, 87:13 <b>arranged</b> 79:25, 84:17 <b>article</b> 54:11 <b>aside</b> 58:22, 107:21 <b>ask</b> 8:10, 8:13, 8:23, 8:24, 11:18, 14:8, 26:7, 26:8, 34:13, 45:19, 51:16, 55:11, 56:16, 59:1, 64:7, 74:23, 76:10, 77:5, 79:13, 81:8, 84:20, 85:24, 107:22, 113:10 <b>asked</b> 13:5, 58:5, 63:18, 95:23, 112:3, 112:6, 112:7, 112:14, 112:18, 113:1, 113:7, 113:11 <b>asking</b> 8:9, 52:2, 52:4, 63:24, 64:1, 66:11, 70:17, 70:18, 70:19, 81:13, 105:5, 111:24 <b>asm</b> 53:11, 53:13 <b>asml</b> 53:5 <b>aspects</b> 62:17
--	---	---	--

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117

<b>assess</b> 63:11	<b>avp</b> 108:14	61:5, 62:25, 63:15, 65:14, 69:24, 72:1, 77:1, 85:5, 88:24, 89:5, 89:15, 91:4, 93:16, 101:9, 101:20, 102:15	93:18, 103:14, 104:18
<b>assist</b> 8:19, 54:12, 55:3, 55:8, 66:5, 66:8, 66:15, 98:18	<b>award</b> 83:16	<b>bases</b> 111:1	<b>become</b> 22:21, 46:9, 46:11
<b>assistance</b> 66:12, 84:2	<b>aware</b> 19:13, 19:16, 50:24, 65:10, 65:23, 87:8, 87:11, 87:12, 87:21, 95:21, 95:25, 96:15, 110:21, 111:1, 111:5	<b>basic</b> 74:16	<b>been</b> 16:6, 16:8, 16:13, 17:19, 19:7, 37:22, 38:19, 40:21, 52:10, 54:5, 58:5, 64:12, 66:17, 72:25, 96:18, 110:22
<b>assisted</b> 66:13		<b>basically</b> 12:25, 22:22, 30:23, 34:11, 71:21, 78:20, 84:12, 84:15, 88:3, 91:24, 94:13, 94:19, 104:10	<b>before</b> 2:12, 6:1, 8:6, 8:11, 8:13, 9:5, 10:15, 42:5, 42:16, 42:18, 42:21, 44:3, 59:2, 67:1, 67:3, 70:22, 73:11, 73:14, 73:15, 73:17, 73:19, 97:21, 104:25, 114:3
<b>association</b> 71:21	<b>B</b>	<b>basis</b> 51:25	<b>began</b> 45:2, 51:9, 76:17, 98:4, 98:7, 110:12
<b>assume</b> 9:1, 10:1, 90:9, 90:19	<b>b-a-n-q-i-a-o</b> 9:19	<b>bates</b> 4:22, 4:26, 4:30, 4:34, 64:15, 66:20, 66:22, 73:4, 73:7, 77:5, 79:9, 79:11, 81:10, 86:1	<b>begin</b> 42:16
<b>attend</b> 67:2, 67:10, 67:17, 79:22, 80:23, 81:11, 81:18	<b>b-o</b> 43:18	<b>bates-stamped</b> 64:21	<b>beginning</b> 42:24
<b>attendance</b> 86:8	<b>bachelor</b> 20:7, 20:8	<b>bears</b> 79:11	<b>begins</b> 5:2
<b>attended</b> 67:11, 71:24, 72:3, 72:5, 77:24, 79:24, 81:3, 82:4, 89:10, 89:22	<b>back</b> 16:24, 22:11, 27:9, 30:16, 30:21, 30:23, 30:24, 38:3, 38:24, 39:4, 51:2, 59:8, 62:2, 64:11, 72:11, 79:14, 83:23, 84:13, 84:20, 85:21, 98:11, 99:1, 99:13, 102:8	<b>became</b> 34:2	<b>behalf</b> 5:9, 5:13, 5:17, 5:21, 5:23, 6:10, 6:11, 48:18, 57:4, 57:6, 57:9, 68:7
<b>attention</b> 80:7	<b>background</b> 19:21, 37:10, 48:17, 63:16, 86:14	<b>because</b> 9:11, 11:4, 11:10, 18:16, 22:19, 23:11, 30:20, 33:10, 36:2, 51:7, 51:8, 61:4, 61:13, 61:17, 62:12, 71:6, 71:10, 77:20, 81:21, 84:24, 90:24, 93:11,	<b>being</b> 48:12, 65:12, 76:7, 85:4, 85:8, 96:23
<b>attorney-client</b> 109:14	<b>bank</b> 1:21, 2:4, 5:10		<b>belief</b> 72:4
<b>attorneys</b> 1:16, 11:21	<b>banqiao</b> 9:17		
<b>attract</b> 72:10	<b>base</b> 65:5		
<b>audio</b> 9:25, 10:2	<b>based</b> 6:7, 14:22, 52:6, 52:8, 53:14, 61:4,		
<b>august</b> 97:22			
<b>authority</b> 91:25, 92:10, 92:21			
<b>authorize</b> 93:1			
<b>available</b> 87:17, 92:18			

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118

<b>believe</b> 79:16, 93:16, 99:7 <b>belongs</b> 94:1 <b>benchmark</b> 100:8, 100:15 <b>benchmarked</b> 100:4, 100:13 <b>benchmarking</b> 99:11, 100:7 <b>besides</b> 100:9, 107:8 <b>best</b> 57:13, 62:8, 71:2, 93:13, 96:2, 108:16 <b>better</b> 84:7 <b>between</b> 17:10, 29:22, 30:3, 30:8, 50:12, 50:18, 50:21, 56:10, 56:19, 59:13, 62:12, 66:4, 74:13, 87:1 <b>birth</b> 15:12 <b>bit</b> 94:16 <b>blvd</b> 3:25 <b>bo</b> 43:15 <b>bo-wen</b> 43:18 <b>board</b> 42:14, 44:23, 45:13, 46:2, 46:7, 46:14, 46:22, 55:23, 55:25, 60:5 <b>boise</b> 18:13, 18:15, 18:24, 19:5, 19:11, 85:8, 85:10, 87:15,	87:21, 87:25, 90:25, 95:22 <b>born</b> 15:16 <b>borough</b> 7:7 <b>both</b> 18:14, 39:6, 77:18, 104:7 <b>bottom</b> 64:18, 74:5, 82:13, 83:15 <b>bought</b> 102:12, 108:4 <b>break</b> 12:7, 13:12, 14:22, 16:15, 17:18, 37:23, 37:24, 38:2, 59:1, 59:2, 59:3, 59:7, 85:15, 85:20 <b>briefing</b> 54:8, 82:15, 82:19, 82:25 <b>briefly</b> 85:25 <b>brought</b> 111:3 <b>building</b> 7:24 <b>business</b> 16:10, 16:16, 17:20, 17:24, 18:6, 18:10, 19:2, 30:11, 37:20, 38:12, 42:19, 42:20, 43:1, 98:14 <b>buy</b> 52:21 <hr/> <b>C</b> <hr/> <b>ca</b> 3:7, 3:13, 3:27 <b>california</b> 1:2, 3:11, 18:21, 79:16	<b>call</b> 25:21, 36:2, 101:20 <b>called</b> 39:9, 41:19, 53:10, 65:24, 75:12, 95:16, 97:22 <b>calls</b> 78:15, 88:1, 89:3, 90:11, 91:2, 96:6, 97:18, 105:14 <b>came</b> 51:13, 71:10, 71:17, 89:2, 89:9, 89:12, 89:20, 90:9, 91:11, 103:10, 104:2, 104:6, 104:18, 104:20, 104:25, 111:7, 112:11 <b>camera</b> 10:6 <b>can</b> 6:5, 6:22, 11:7, 13:12, 16:15, 16:17, 17:18, 25:10, 26:14, 31:19, 35:25, 37:23, 37:24, 45:24, 54:1, 54:14, 56:16, 59:3, 60:11, 63:2, 63:11, 63:22, 64:21, 66:24, 67:13, 73:25, 74:4, 75:3, 77:5, 78:16, 79:19, 80:6, 82:11, 99:11, 109:23, 109:24 <b>cannot</b> 7:14, 22:19, 32:18, 36:1, 42:7, 42:8,	62:13 <b>capabilities</b> 32:7, 107:3 <b>capability</b> 32:10 <b>capacity</b> 16:8 <b>care</b> 25:8, 25:11 <b>career</b> 21:17 <b>case</b> 1:6, 9:11, 9:13, 10:16, 114:11 <b>caspa</b> 66:12, 66:15, 67:2, 67:4, 67:7, 67:10, 67:14, 69:20, 69:23, 71:18, 71:19, 71:20, 71:21, 71:24, 72:1, 73:13, 73:15, 73:18, 73:19, 77:24, 79:21, 80:21, 81:23, 82:1, 82:4, 82:5, 82:8 <b>catch</b> 32:18 <b>category</b> 77:13, 77:21 <b>cell</b> 60:22, 61:6, 61:14, 61:18, 100:2, 102:21, 102:22, 102:25, 106:4 <b>ceo</b> 44:7, 72:8 <b>certainly</b> 8:18 <b>certificate</b> 114:1 <b>certified</b> 54:10 <b>certify</b> 114:4
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Conducted on July 10, 2018

119

<b>chairman</b> 10:20, 81:22 <b>chambers</b> 50:3 <b>chang</b> 3:34 <b>change</b> 28:13, 28:15 <b>changed</b> 28:20, 35:3, 38:18 <b>charge</b> 35:11, 39:23, 65:1, 99:2, 99:5 <b>chart</b> 76:17, 77:6, 77:7, 77:15, 78:12, 78:18, 78:21 <b>check</b> 3:33, 6:14, 39:2, 46:18, 49:17, 53:11, 61:15, 78:3, 88:6, 89:13, 92:4, 94:4, 94:15, 98:2, 113:5 <b>chen</b> 1:18, 1:20, 2:1, 2:3, 3:15, 4:1, 5:3, 6:16, 6:20, 6:24, 7:3, 7:4, 11:16, 13:16, 15:12, 17:9, 19:20, 26:7, 28:6, 44:14, 45:17, 45:24, 48:25, 50:23, 54:5, 54:12, 54:14, 54:16, 55:3, 55:14, 56:8, 58:22, 59:11, 64:12, 64:17, 65:19, 66:17, 66:24, 67:4, 67:22, 72:25,	73:9, 74:4, 76:10, 78:13, 78:25, 79:5, 79:13, 80:6, 80:19, 81:1, 81:9, 82:11, 82:15, 82:17, 83:17, 84:20, 85:24, 87:7, 90:3, 91:19, 106:1, 112:14 <b>cheng</b> 3:32, 6:12 <b>cheng-kun</b> 6:24 <b>chengkung</b> 19:22, 20:2, 20:3, 20:4 <b>chester</b> 3:31, 5:8 <b>chia-fang</b> 3:35, 12:9, 12:16 <b>chia-ling</b> 3:32, 6:12 <b>china</b> 44:9, 47:21, 71:5, 72:9, 72:11, 80:10 <b>china's</b> 54:13 <b>chinese</b> 6:25, 7:13, 7:16, 26:3, 26:21, 32:18, 34:14, 36:16, 43:13, 45:10, 51:22, 51:24, 54:18, 62:23, 71:8, 71:19, 71:22, 72:16, 98:2, 109:1 <b>chip</b> 74:19, 74:21, 75:7, 102:1, 102:4, 102:6, 106:9 <b>chips</b> 27:23, 100:10,	101:8, 101:14, 101:16, 101:19, 102:9, 102:13, 102:14, 107:13, 107:18, 107:21, 107:24, 108:4, 108:8, 108:10, 108:11, 108:12, 108:17, 108:19, 108:22 <b>choose</b> 37:11, 93:18 <b>chu</b> 7:6, 7:18 <b>circuit</b> 1:11, 44:16 <b>citizenship</b> 16:4 <b>city</b> 15:20, 15:24, 47:16, 80:13, 80:14 <b>clarification</b> 12:10, 49:23, 78:4 <b>clarify</b> 8:24, 31:19 <b>clarity</b> 95:18 <b>clear</b> 14:13, 16:21, 37:19, 55:24, 88:3, 88:7, 88:20, 96:9, 113:6 <b>clearly</b> 21:4 <b>client</b> 84:6 <b>clients</b> 84:5 <b>closer</b> 17:19 <b>collab</b> 95:17 <b>collaboration</b> 44:8, 50:21, 68:8	<b>colleagues</b> 70:11 <b>collect</b> 12:23, 13:17, 70:1 <b>collecting</b> 13:2 <b>column</b> 83:4 <b>com</b> 54:11, 95:17 <b>come</b> 11:8, 70:25, 72:11, 81:23, 93:4, 105:1 <b>comes</b> 89:25, 100:7 <b>coming</b> 103:25 <b>commence</b> 55:13 <b>commences</b> 55:21 <b>commercial</b> 101:4, 102:12, 106:12, 107:7, 107:9 <b>committed</b> 61:21 <b>common</b> 62:12 <b>communications</b> 109:16 <b>companies</b> 42:11, 49:12, 49:15, 49:20, 49:23, 72:4, 75:11, 80:8, 99:15, 99:19, 99:21, 100:3 <b>company</b> 17:4, 17:10, 23:3, 23:4, 23:6, 24:2, 24:3, 24:4, 24:23, 25:21, 26:5, 26:14, 26:15, 26:18,
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USD-0351629

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Transcript of Stephen Chen

Conducted on July 10, 2018

120

26:22, 27:10, 28:2, 28:8, 29:11, 29:22, 29:25, 30:3, 30:16, 30:22, 37:14, 37:16, 44:16, 48:12, 70:22, 72:20, 74:24, 75:6, 75:16, 75:17, 78:17, 78:22, 94:10, 97:16, 97:21, 98:16, 99:2, 104:25, 112:25 <b>company's</b> 94:20 <b>compare</b> 61:4, 61:5, 61:7 <b>comparisons</b> 106:2 <b>compensation</b> 47:9, 47:13 <b>competition</b> 103:16 <b>complete</b> 8:11, 20:15, 68:16, 107:6 <b>completed</b> 76:7 <b>completes</b> 79:25 <b>complimentary</b> 54:19 <b>compound</b> 14:19 <b>computer</b> 17:4, 94:10 <b>concern</b> 103:16 <b>concerns</b> 102:8, 108:22, 108:23, 109:4, 109:11 <b>conclusion</b> 96:8 <b>condition</b> 55:22	<b>conduct</b> 111:8, 111:12 <b>conducted</b> 107:20, 107:23 <b>confidential</b> 1:16, 111:4, 111:10, 111:12, 112:15 <b>confirm</b> 45:3, 45:8 <b>conjecture</b> 88:2, 89:4, 90:12, 91:3, 96:7 <b>connect</b> 94:19, 94:21 <b>connection</b> 11:6, 13:18, 54:8, 56:11, 58:11, 74:10 <b>construction</b> 39:1, 39:6, 39:20, 39:25, 40:1, 40:4, 40:20, 54:13, 55:4, 55:9, 76:7, 76:11 <b>contact</b> 88:8, 88:12, 88:22, 91:5, 91:6, 91:9, 91:16, 91:18, 93:5, 93:21, 94:12, 103:25, 104:4, 104:11 <b>contacted</b> 104:8 <b>contain</b> 54:10 <b>contained</b> 73:22 <b>containing</b> 14:25, 15:4 <b>contains</b> 15:9, 56:12, 66:22 <b>content</b> 11:17	<b>continuing</b> 102:24 <b>conversations</b> 11:17 <b>coo</b> 67:23 <b>cooperation</b> 16:23, 41:25, 42:10, 56:19, 56:23, 57:4, 59:13, 60:12, 66:4, 79:1, 87:1 <b>copper</b> 21:4, 21:6, 21:8, 21:9, 21:10 <b>core</b> 42:25 <b>corner</b> 56:15, 74:5 <b>corp</b> 5:5 <b>corporate</b> 4:9, 33:4, 33:6, 33:8, 38:13, 38:16, 38:22, 45:18, 45:21, 51:3 <b>corporation</b> 1:10, 3:21, 8:3 <b>correct</b> 8:3, 11:3, 12:2, 13:16, 17:11, 18:24, 19:14, 19:18, 24:24, 29:7, 30:8, 32:5, 32:11, 32:14, 32:23, 33:1, 33:20, 34:3, 35:5, 35:17, 37:20, 44:16, 47:21, 48:6, 48:9, 49:2, 49:5, 49:7, 49:10, 49:14, 49:25, 50:4, 50:8, 50:13,	50:19, 51:1, 51:6, 56:4, 57:15, 57:25, 58:3, 58:13, 58:17, 58:20, 59:14, 60:9, 66:9, 66:14, 68:19, 68:20, 69:9, 70:5, 74:19, 76:14, 77:14, 77:18, 79:3, 80:4, 81:1, 82:2, 82:25, 86:6, 86:12, 86:17, 86:24, 87:5, 87:10, 87:15, 87:21, 96:5, 96:21, 99:9, 103:3, 103:20, 106:5, 107:1, 107:2, 107:14, 108:17, 108:18, 110:4, 110:19, 111:16, 111:18, 113:1, 113:7, 113:8, 114:5 <b>correction</b> 7:17, 39:3, 43:17, 45:11, 46:19, 49:18, 53:13, 61:16, 72:22, 89:13 <b>cost</b> 34:19, 34:22, 59:22, 59:23 <b>could</b> 21:5, 24:10, 31:14, 55:11, 61:12, 64:3, 88:20, 101:5 <b>couldn't</b> 81:23 <b>counsel</b> 3:34, 3:35, 5:14, 16:17, 48:19, 102:7, 109:12, 109:16,
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USD-0351630



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Transcript of Stephen Chen

Conducted on July 10, 2018

121

109:21, 114:10 <b>counsel's</b> 14:23 <b>count</b> 68:25 <b>counts</b> 65:16, 68:22 <b>couple</b> 11:19, 59:2, 79:7, 105:23 <b>course</b> 8:8, 8:16, 12:11, 19:9, 44:19, 93:20, 100:5 <b>court</b> 1:1, 4:14, 4:18, 5:12, 6:1, 6:3, 6:5, 8:19, 10:23, 12:10, 17:1, 17:5, 20:11, 21:5, 24:10, 24:14, 24:17, 24:21, 25:23, 26:1, 27:13, 28:17, 29:24, 31:14, 31:20, 45:11, 45:15, 54:3, 54:8, 56:6, 56:10, 95:4, 113:17 <b>cover</b> 21:11, 56:12 <b>covers</b> 65:17, 84:12 <b>create</b> 75:24 <b>creates</b> 106:9 <b>criminal</b> 110:23 <b>current</b> 7:12, 54:20, 65:14 <b>currently</b> 41:23, 76:22 <b>cycle</b> 34:23	<b>D</b> <b>dan</b> 3:22, 3:24, 5:21, 5:22 <b>daniel</b> 5:20 <b>data</b> 89:12, 89:25 <b>date</b> 5:6, 10:7, 15:12, 16:18, 36:22, 36:25, 45:4, 46:11, 46:13, 46:20, 47:3 <b>dated</b> 56:19, 73:3 <b>dates</b> 19:1 <b>day</b> 3:4, 3:10, 3:16, 5:17, 5:19, 8:8, 11:24, 44:19, 67:17, 67:18, 67:19, 68:2, 79:21, 79:23, 79:24, 114:14 <b>days</b> 67:14 <b>deal</b> 33:10, 109:23 <b>debate</b> 109:18 <b>december</b> 110:11, 110:16 <b>decent</b> 8:17 <b>decide</b> 91:25, 92:10, 102:17 <b>decided</b> 51:2, 102:20, 107:12, 108:18, 108:24, 109:5 <b>decision</b> 55:24, 99:8	<b>decision-making</b> 48:1, 109:21 <b>defendants</b> 1:14 <b>defined</b> 61:3 <b>definition</b> 60:19 <b>degree</b> 19:24, 20:6, 20:7, 20:8, 20:15, 20:20, 22:14, 23:1, 23:12 <b>delegation</b> 49:1 <b>deleted</b> 14:5 <b>department</b> 10:3, 28:11, 28:19, 29:4, 38:12, 38:25, 39:1, 39:5, 39:6, 39:18, 40:6, 40:19, 40:20, 40:23, 40:25, 57:12, 69:4, 69:17, 84:14, 91:18, 91:24, 92:3, 92:20, 92:21, 93:1, 108:9, 108:11, 108:15, 111:7, 111:21, 112:11 <b>departments</b> 40:22 <b>depending</b> 69:5 <b>depends</b> 61:17 <b>depict</b> 74:15 <b>depos</b> 5:9, 5:13 <b>deposition</b> 1:18, 2:1, 5:3, 5:9, 8:5, 8:17,	9:4, 10:24, 10:25, 11:1, 11:6, 11:22, 12:22, 45:9, 50:3, 52:9, 63:6, 114:4 <b>deputy</b> 27:19, 27:20, 28:20, 44:1 <b>description</b> 74:12, 78:23 <b>description"</b> 77:13 <b>design</b> 21:23, 23:3, 23:4, 24:3, 29:14, 30:13, 60:24, 74:22, 74:24, 74:25, 75:3, 75:4, 75:6, 75:7, 75:8, 75:9, 75:18, 75:19, 100:1, 100:2, 102:17, 106:4, 106:14, 106:16, 106:18, 106:22, 106:24, 107:3, 107:6 <b>designed</b> 29:16 <b>destroyed</b> 14:5, 108:11 <b>detail</b> 22:22 <b>detailed</b> 101:3, 101:7 <b>details</b> 99:4 <b>develop</b> 56:25, 75:1, 97:6, 105:20 <b>developed</b> 27:4, 60:17, 85:4, 85:8, 91:12, 97:13, 97:17 <b>developing</b> 32:6
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PLANET DEPOS

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USD-0351631



## CONFIDENTIAL - ATTORNEYS' EYES ONLY

Transcript of Stephen Chen

Conducted on July 10, 2018

122

<b>development</b> 22:23, 51:18, 52:17, 52:18, 52:25, 53:18, 57:20, 57:24, 59:19, 59:20, 59:25, 60:9, 61:20, 63:8, 63:11, 68:13, 68:17, 69:5, 74:2, 74:13, 74:15, 74:16, 74:18, 76:14, 76:17, 76:23, 78:13, 79:2, 85:10, 99:9, 99:14, 107:4, 108:14, 109:10, 110:9 <b>developments</b> 99:18 <b>device</b> 60:25, 61:8 <b>devices</b> 48:6, 49:25, 50:2 <b>didn't</b> 61:4, 67:7, 71:16, 81:21, 84:23, 95:4, 95:12, 108:6, 111:6, 112:10 <b>diego</b> 3:6 <b>differ</b> 61:10 <b>different</b> 7:23, 26:14, 61:13, 70:22, 83:7, 83:9, 94:16, 104:25, 109:23, 111:21 <b>difficult</b> 35:13 <b>dimension</b> 106:20 <b>dimensions</b> 102:3	<b>direct</b> 18:16, 80:6, 88:12, 88:22, 91:16, 91:18, 104:13, 104:17 <b>direction</b> 99:17, 107:15, 109:1, 109:6 <b>directions</b> 101:3 <b>directly</b> 88:4, 93:21 <b>director</b> 27:19, 27:20, 28:20, 28:21, 29:5, 34:6, 34:8, 34:17, 35:4, 35:6, 35:13, 35:14, 40:23, 41:2, 44:1, 46:7 <b>directors</b> 42:14, 44:23, 45:13, 46:3, 46:15, 46:22, 55:23, 55:25, 60:5, 104:13 <b>disagree</b> 109:24 <b>disclose</b> 11:17 <b>discuss</b> 22:10 <b>discussed</b> 50:12, 109:7 <b>discussion</b> 50:20, 76:1, 86:15, 86:19, 86:21, 99:13 <b>discussions</b> 42:19, 42:21, 43:2, 50:18, 83:24, 84:3, 84:9, 86:11, 107:16, 109:8, 109:9, 110:12, 112:1 <b>dispute</b> 10:19, 54:9	<b>dissolve</b> 55:25 <b>dissolved</b> 44:24, 45:14 <b>dissolving</b> 45:4 <b>district</b> 1:1, 1:2 <b>division</b> 27:20 <b>document</b> 4:22, 4:26, 4:30, 4:34, 45:20, 46:1, 53:25, 56:14, 64:14, 64:20, 65:23, 66:19, 66:22, 66:25, 67:3, 67:22, 73:2, 73:6, 73:9, 75:20, 76:11, 79:7, 79:8, 79:14, 82:13, 84:1, 84:16, 84:18, 86:1, 87:23, 87:25, 88:25, 89:2, 90:4, 90:8, 90:9, 90:20, 90:21, 90:24 <b>documentary</b> 73:10 <b>documentation</b> 88:15, 91:21, 106:3 <b>documents</b> 12:12, 12:19, 12:24, 13:2, 13:3, 13:6, 13:18, 13:22, 14:1, 14:6, 14:9, 14:10, 14:15, 14:16, 14:17, 15:1, 15:4, 15:9, 44:11, 51:12, 51:13, 87:12,	87:16, 87:18, 88:18, 89:6, 89:8, 89:9, 89:17, 89:20, 90:13, 90:18, 90:24, 92:1, 92:11, 92:14, 92:17, 92:25, 93:7, 93:9, 93:14, 94:18, 96:20, 100:10, 106:8, 107:4, 107:10, 111:4, 111:10, 111:12, 112:4, 112:8, 112:10, 112:16, 112:19, 112:22, 112:23, 113:3, 113:12 <b>does</b> 1:12, 13:21, 14:14, 22:2, 22:5, 39:12, 40:4, 40:15, 43:12, 44:6, 51:17, 52:16, 53:18, 60:21, 61:7, 61:10, 74:14, 76:13, 76:23, 77:8, 78:12, 91:10, 91:17, 93:13, 107:2, 111:22 <b>doing</b> 74:18, 74:19 <b>don't</b> 8:23, 10:4, 10:6, 11:16, 19:20, 22:24, 32:20, 48:22, 56:2, 62:7, 63:14, 69:13, 83:19, 83:22, 85:14, 87:19, 88:11, 89:7, 89:19, 93:6, 95:9, 108:9 <b>done</b> 11:7, 68:13,
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USD-0351632

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Transcript of Stephen Chen

Conducted on July 10, 2018

123

85:2, 85:10, 85:12, 113:15 <b>down</b> 16:15, 17:18 <b>download</b> 89:6, 89:16, 89:18, 94:18 <b>downloaded</b> 94:9 <b>dozen</b> 104:24 <b>dr</b> 3:5 <b>dram</b> 13:23, 14:2, 14:6, 14:15, 15:1, 15:5, 15:9, 24:2, 24:4, 24:23, 27:25, 28:8, 29:11, 29:12, 29:14, 29:16, 30:12, 30:13, 30:18, 30:19, 31:4, 31:25, 32:3, 32:7, 32:10, 37:5, 37:8, 37:10, 37:12, 37:14, 37:19, 41:23, 41:24, 50:12, 50:18, 51:19, 52:14, 52:17, 53:18, 54:12, 55:21, 56:18, 56:25, 57:25, 58:11, 60:25, 61:8, 62:2, 62:5, 62:13, 62:15, 62:19, 63:9, 64:9, 66:6, 66:14, 69:10, 70:6, 70:7, 70:10, 70:12, 70:15, 76:24, 77:22, 79:2, 82:14, 82:20, 84:11,	84:13, 86:11, 86:16, 86:24, 87:4, 93:14, 93:17, 93:22, 93:24, 93:25, 94:8, 97:10, 97:13, 98:16, 98:18, 99:9, 99:15, 99:21, 101:16, 105:4, 105:5, 105:20, 107:13, 107:21, 107:24, 108:17, 110:9, 110:15, 111:22 <b>dram-experienced</b> 61:25 <b>drives</b> 14:11, 15:4 <b>due</b> 71:5 <b>duly</b> 4:1, 6:16 <b>during</b> 8:8, 8:16, 12:11, 12:19, 19:9, 44:19, 49:4, 67:7, 67:12, 68:1, 68:6, 68:10, 69:19, 69:23, 86:10, 90:3, 106:2 <b>duties</b> 38:21, 47:23 <hr/> <b>E</b> <hr/> <b>e-l-p-i-d-a</b> 30:1, 30:2 <b>each</b> 49:12 <b>earlier</b> 83:2, 83:8, 87:20, 105:16 <b>early</b> 22:20, 43:1, 55:14 <b>educational</b> 19:21	<b>effective</b> 47:3 <b>effort</b> 12:23 <b>efforts</b> 13:17, 106:2 <b>either</b> 18:21, 73:10 <b>electric</b> 29:18 <b>electrical</b> 20:8 <b>electronic</b> 14:10, 14:16, 15:8 <b>elpida</b> 29:23, 30:1, 30:3, 30:8, 30:17, 30:19, 30:23, 97:17, 97:22, 97:23, 98:1, 98:5, 98:10, 98:18, 98:22 <b>elpida's</b> 98:14 <b>else</b> 66:16 <b>email</b> 64:18, 64:23, 65:9, 65:11 <b>employed</b> 17:20, 23:10, 23:20, 25:2, 35:20, 50:7, 62:19, 64:10, 84:21, 87:7, 96:19, 96:23, 111:10, 111:14, 111:16, 114:10 <b>employee</b> 33:19, 34:3, 63:16, 83:11, 83:14, 96:15, 110:18 <b>employees</b> 14:5, 33:17, 65:2, 65:6,	66:14, 70:13, 70:16, 81:9, 81:17, 81:25, 82:1, 87:8, 87:13, 88:14, 89:5, 89:16, 91:20, 92:24, 93:20, 96:21, 103:6, 104:9, 105:3 <b>employer</b> 7:25 <b>employers</b> 16:16 <b>employment</b> 17:14, 48:3, 48:9, 48:12 <b>end</b> 19:3, 19:5, 23:22, 31:2, 36:13, 42:23, 45:12, 99:7, 110:11 <b>endorsement</b> 84:6 <b>engaged</b> 75:7 <b>engineer</b> 23:5, 24:8, 25:8, 25:11, 83:10 <b>engineering</b> 20:9, 27:2, 29:5, 39:7, 41:10, 41:16, 100:25 <b>engineers</b> 48:9, 61:25, 62:5, 62:16, 62:19, 63:9, 63:19, 64:5, 64:9, 66:5, 66:9, 68:24, 68:25, 69:10, 69:19, 69:23, 70:7, 70:10, 70:12, 70:15, 76:22
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Conducted on July 10, 2018

124

<b>english</b> 4:2, 6:17, 7:1, 8:17, 26:10, 38:13, 40:15, 41:4, 42:1, 43:12, 43:20, 43:21, 44:12, 45:24, 49:3, 49:6, 50:5, 54:17, 54:22, 61:23, 62:9, 65:22, 71:20, 72:20, 79:18, 82:18, 83:9, 83:19, 86:18, 90:5, 90:7, 90:17, 93:18, 95:2, 95:8, 96:13, 96:17, 97:4, 100:14, 101:23, 106:22, 107:19, 110:5, 111:23 <b>enough</b> 44:20, 52:20 <b>enter</b> 20:14 <b>entered</b> 19:23, 56:23, 57:14 <b>entire</b> 38:15, 96:18, 96:22 <b>entirely</b> 61:9 <b>entities</b> 96:4 <b>entity</b> 33:20, 33:22, 33:25, 44:19, 74:22 <b>equipment</b> 21:16, 21:23, 39:16, 40:5, 40:7, 48:5, 48:15, 49:13, 49:24, 50:24, 50:25, 51:5,	51:9, 51:14, 51:18, 52:5, 52:7, 52:13, 52:16, 52:19, 52:21, 52:22, 52:23, 53:2, 53:17, 53:19, 53:20, 53:22, 53:23, 57:19, 57:24, 58:2, 58:6, 58:10, 58:12, 81:12, 81:19 <b>esmt</b> 75:14, 75:15 <b>establish</b> 63:9 <b>established</b> 78:17 <b>et</b> 5:5 <b>event</b> 66:15, 67:3, 67:5, 67:8, 67:10, 67:11, 67:15, 69:20, 69:23, 71:24, 72:2, 72:5, 72:7, 73:16, 73:18, 73:19, 77:25, 78:9, 79:22, 79:25, 80:21, 81:23, 82:1, 82:9 <b>eventually</b> 27:7, 29:6 <b>ever</b> 8:5, 9:4, 13:25, 14:5, 14:24, 15:3, 15:7, 16:6, 44:22, 52:13, 90:4, 96:11, 105:19, 107:20, 107:23, 111:8, 112:3, 112:7, 112:14, 112:18, 113:11	<b>every</b> 28:18, 28:19 <b>everybody</b> 72:6 <b>everything</b> 78:20, 84:12 <b>exact</b> 7:19, 36:25, 76:25 <b>exactly</b> 87:18, 94:11, 95:13 <b>examination</b> 4:6, 4:37, 4:39, 6:19, 97:2, 105:25 <b>example</b> 53:8, 71:14, 87:17, 89:21, 94:13, 94:22 <b>excuse</b> 39:22, 73:5 <b>executive</b> 3:5, 103:2 <b>exhibit</b> 4:8, 4:12, 4:13, 4:16, 4:17, 4:21, 4:25, 4:29, 4:33, 45:18, 45:21, 54:2, 54:6, 54:7, 56:5, 56:8, 56:9, 64:13, 64:14, 64:20, 66:18, 66:19, 73:1, 73:6, 73:23, 79:6, 79:8, 81:10, 85:25 <b>exist</b> 63:10 <b>existed</b> 62:5, 63:19, 64:5 <b>expected</b> 65:2 <b>experience</b> 21:22, 62:2,	62:20, 63:16, 65:7, 88:24 <b>experienced</b> 62:4, 63:9, 64:9 <b>expertise</b> 62:16 <b>explain</b> 100:25 <b>explanation</b> 24:15, 82:23 <b>express</b> 71:13 <b>extent</b> 109:15 <b>eyes</b> 1:16 <hr/> <b>F</b> <hr/> <b>f</b> 60:22 <b>fa</b> 101:11 <b>fab</b> 19:17, 35:3, 35:5, 35:7, 35:9, 35:11, 35:14, 37:3, 37:4, 87:21, 87:23, 88:5, 88:9, 88:12, 88:15, 88:22, 89:1, 90:4, 90:9, 90:19, 90:24, 90:25, 91:6, 91:7, 91:17, 91:20, 92:23, 92:25, 93:1, 93:4, 93:5 <b>fabless</b> 23:4, 24:3 <b>fabrication</b> 19:10, 19:13, 19:17, 48:15, 49:13, 49:24, 51:5 <b>fabs</b> 35:8
---	---	--	--

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USD-0351634



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Transcript of Stephen Chen

Conducted on July 10, 2018

125

<b>facilities</b> 19:10, 19:14, 40:2	<b>file-sharing</b> 87:10	<b>focusing</b> 34:19	<b>from</b> 4:3, 4:10,
<b>facility</b> 18:21, 19:17, 38:25, 39:5, 39:20, 39:24, 39:25, 40:4, 40:20, 65:15	<b>filed</b> 4:14, 4:18, 54:3, 54:7, 56:6, 56:10	<b>follow</b> 65:20	5:18, 5:21, 6:17, 18:18, 19:22, 19:25, 20:4, 23:11, 25:20, 26:4, 28:1, 28:19, 29:10, 29:17, 38:6, 45:19, 45:22, 46:4, 47:9, 47:13, 49:2, 51:10, 52:22, 53:6, 53:7, 53:8, 53:13, 57:11, 58:2, 58:6, 58:12, 58:22, 59:19, 59:20, 61:13, 62:3, 64:23, 65:7, 66:11, 67:13, 69:3, 69:7, 69:16, 69:25, 70:7, 70:10, 70:25, 71:2, 71:4, 71:10, 72:10, 80:13, 81:5, 81:13, 81:17, 82:3, 82:4, 82:6, 82:8, 83:15, 84:1, 84:6, 89:2, 89:6, 89:9, 89:12, 89:17, 89:20, 89:24, 89:25, 90:1, 90:9, 90:21, 90:24, 91:6, 91:11, 93:4, 93:19, 94:9, 94:18, 94:23, 97:8, 97:9, 99:22, 99:25, 100:10, 103:10, 103:13, 103:14, 103:15, 103:17, 103:19,
<b>fact</b> 86:5, 88:17	<b>filing</b> 4:10, 45:19, 45:22, 56:13, 56:14	<b>follow-up</b> 85:16	
<b>factory</b> 34:19, 34:25, 35:1	<b>final</b> 80:9	<b>follow-ups</b> 105:24	
<b>failure</b> 25:9, 25:13, 25:14, 101:11	<b>finance</b> 33:10, 44:2, 57:11	<b>foregoing</b> 114:3, 114:5	
<b>failures</b> 25:15	<b>financial</b> 114:12	<b>form</b> 69:7, 73:10	
<b>fair</b> 8:14, 14:23, 17:25, 44:20, 79:23, 87:24, 109:22	<b>find</b> 78:8, 103:9	<b>formed</b> 71:22	
<b>fairs</b> 77:16	<b>finding</b> 25:24	<b>former</b> 44:7, 70:11, 70:13, 70:16, 103:2, 110:18	
<b>familiar</b> 84:22, 95:15	<b>first</b> 11:24, 22:24, 23:1, 23:15, 24:23, 35:23, 35:24, 40:12, 43:8, 43:17, 56:22, 73:1, 77:21, 77:22, 97:3, 100:6, 108:25	<b>forth</b> 60:12	
<b>familiarize</b> 66:25	<b>five</b> 12:6, 22:21, 104:24, 105:1	<b>forward</b> 55:15	
<b>favor</b> 74:4	<b>five-minute</b> 85:15	<b>found</b> 18:18, 75:16	
<b>feature</b> 61:1	<b>flew</b> 18:12, 18:14	<b>foundation</b> 78:15	
<b>february</b> 9:12, 10:8, 10:9, 10:13, 42:4, 42:6, 42:17, 42:18, 42:21, 44:23, 45:2, 45:13, 47:1, 55:8, 60:2, 61:24, 62:6, 62:18, 63:17, 64:3, 64:8	<b>flight</b> 18:16	<b>foundational</b> 63:12, 85:9	
<b>ferrite</b> 25:21	<b>flip</b> 85:15	<b>foundry</b> 37:16, 75:5	
	<b>floor</b> 1:21, 2:4, 3:11, 5:10, 22:10	<b>four</b> 12:6, 22:8, 34:23, 60:15, 80:9, 80:22, 80:25, 81:5, 81:9, 81:13, 81:17, 81:25, 82:7, 104:24, 105:1	
	<b>focused</b> 82:12	<b>four-year</b> 61:20	
		<b>francisco</b> 3:12, 3:26, 18:12, 18:15, 18:19	
		<b>friday</b> 67:15	
		<b>friend</b> 16:10	

PLANET DEPOS

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USD-0351635

## CONFIDENTIAL - ATTORNEYS' EYES ONLY

Transcript of Stephen Chen

Conducted on July 10, 2018

126

105:13, 106:18, 106:19, 107:1, 107:22, 110:4 <b>front</b> 9:15 <b>fujian</b> 1:10, 47:17, 56:20, 56:24, 57:18, 71:4 <b>full</b> 6:22, 65:15, 89:15, 92:6, 94:4 <b>function</b> 38:14, 38:16, 77:13, 77:22 <b>fung</b> 64:24 <b>further</b> 4:39, 6:6, 48:20, 96:24, 105:22, 105:25, 108:7 <b>future</b> 99:17	81:22, 100:19 <b>given</b> 4:2, 6:17, 37:10, 38:5, 44:7, 114:6 <b>global</b> 34:9, 35:16, 35:19 <b>go</b> 18:10, 22:14, 26:1, 30:23, 30:24, 36:14, 71:12, 71:16, 72:7, 81:21, 99:9, 108:24, 109:5, 112:24 <b>going</b> 8:25, 11:18, 14:22, 26:7, 26:8, 34:13, 37:22, 37:25, 51:20, 55:15, 56:2, 59:5, 63:4, 63:5, 64:7, 64:17, 67:2, 69:12, 80:2, 85:18, 85:24, 109:17, 113:21 <b>gone</b> 37:14, 58:25 <b>good</b> 5:18, 6:20, 6:21, 109:9, 113:16 <b>got</b> 26:14, 28:18, 35:2, 36:17, 71:5, 71:6, 71:9, 72:18, 84:5, 99:22, 100:10, 101:8, 103:14 <b>government</b> 60:4, 71:11, 71:13, 80:10, 80:25, 81:6, 82:6, 82:8	<b>graduate</b> 19:25, 20:3, 23:11 <b>graduated</b> 19:22, 72:10 <b>graduates</b> 72:16 <b>great</b> 101:10 <b>ground</b> 62:12, 109:14 <b>group</b> 3:24, 5:21, 5:23, 35:3, 38:14, 42:25, 110:19 <b>guess</b> 62:7 <hr/> <b>H</b> <hr/> <b>h-u-a-n-g</b> 43:10 <b>had</b> 8:5, 12:2, 13:1, 13:25, 16:23, 16:24, 19:4, 32:9, 52:20, 62:2, 64:3, 70:10, 72:9, 74:7, 90:8, 90:14, 90:20, 91:20, 93:5, 97:8, 99:4, 101:7, 101:10, 102:8, 104:11, 104:13, 104:16, 105:21, 107:15, 111:11, 112:21, 112:22 <b>hadn't</b> 90:12 <b>half</b> 7:10, 47:11, 47:12, 76:19, 79:14 <b>half-day</b> 11:11 <b>hand</b> 108:12, 114:14	<b>handed</b> 54:5, 66:17, 72:25, 79:5, 108:8 <b>handing</b> 45:17, 64:12 <b>happened</b> 93:5, 108:9 <b>happy</b> 104:19 <b>hard</b> 90:19, 94:11 <b>hard-copy</b> 14:16 <b>hardly</b> 91:6 <b>has</b> 13:5, 13:25, 14:4, 14:14, 14:24, 15:3, 15:7, 19:13, 19:16, 48:19, 52:10, 52:13, 52:19, 54:15, 57:23, 58:4, 58:10, 64:12, 66:17, 70:6, 72:25, 73:4, 74:18, 76:6, 77:6, 78:22, 91:24, 92:10, 107:20, 107:23, 108:16 <b>hats</b> 47:6, 84:15 <b>have</b> 7:8, 8:5, 9:4, 9:9, 10:13, 10:20, 11:10, 11:20, 13:1, 13:17, 13:21, 13:24, 14:7, 14:14, 16:6, 16:8, 16:12, 17:7, 17:20, 19:7, 22:8, 22:17, 22:22, 23:12, 28:1,
<b>G</b>			
<b>game</b> 109:22 <b>gave</b> 74:12, 81:24, 100:1 <b>generally</b> 11:7, 33:4 <b>generations</b> 60:16, 60:18 <b>get</b> 16:17, 20:18, 33:9, 33:11, 35:15, 36:4, 48:17, 81:21, 95:4, 99:25, 101:7, 106:20 <b>getting</b> 100:9, 103:18 <b>give</b> 8:11, 25:10, 26:9, 62:7,			

PLANET DEPOS

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USD-0351636



## CONFIDENTIAL - ATTORNEYS' EYES ONLY

Transcript of Stephen Chen

Conducted on July 10, 2018

127

31:16, 33:11, 34:22, 38:19, 40:5, 40:15, 40:20, 42:11, 43:12, 45:17, 51:4, 51:7, 51:9, 62:9, 62:16, 63:7, 73:9, 73:14, 76:20, 76:21, 76:23, 78:18, 78:22, 79:6, 84:23, 85:16, 88:8, 88:10, 88:11, 88:14, 88:17, 89:22, 90:14, 90:18, 91:6, 91:16, 91:17, 91:20, 91:25, 92:8, 92:11, 92:16, 92:25, 93:1, 93:8, 95:18, 95:19, 96:11, 96:14, 96:17, 96:19, 96:22, 96:24, 97:1, 103:5, 105:19, 105:21, 105:23, 106:17, 107:17, 109:5, 110:22, 112:3, 112:6, 112:7, 112:13, 112:18, 113:11, 114:11, 114:13 <b>having</b> 92:21 <b>he's</b> 52:6, 83:9, 111:21 <b>head</b> 65:16, 68:22, 68:24 <b>head-hunter</b> 71:9 <b>head-hunters</b> 71:7 <b>heading</b> 46:2, 56:18,	74:15 <b>headquarter</b> 83:25 <b>headquarters</b> 18:23, 87:14, 95:22 <b>hearing</b> 4:15, 4:19, 54:3, 56:6 <b>held</b> 2:1, 29:3, 72:2 <b>help</b> 74:24, 75:3 <b>helped</b> 75:21, 83:25, 84:10 <b>here</b> 5:2, 11:2, 11:8, 12:22, 48:18, 64:18, 67:14 <b>hereby</b> 114:4 <b>hereunto</b> 114:13 <b>high</b> 19:21 <b>him</b> 36:2, 48:20, 52:2, 52:4, 62:7, 63:18, 71:17, 89:22, 104:5, 112:6 <b>hire</b> 75:3, 103:12, 103:19 <b>hired</b> 44:25, 48:12, 62:2, 70:6, 110:3, 110:18 <b>hiring</b> 103:6 <b>his</b> 41:4, 41:11, 43:6, 45:9, 52:3, 52:7, 52:8, 63:3, 63:15, 63:18,	63:23, 71:5, 71:6, 71:9, 113:3, 113:12 <b>hit</b> 34:10 <b>hke</b> 53:7 <b>ho</b> 103:24, 103:25, 104:2, 110:6, 110:8, 110:21, 111:2, 111:9, 111:11, 111:14, 111:18, 111:19, 112:3, 112:16 <b>ho's</b> 112:9 <b>hopefully</b> 68:15, 76:18 <b>hour</b> 12:18, 37:23, 58:25 <b>hours</b> 12:6 <b>houses</b> 75:3, 75:9, 75:18 <b>how</b> 7:8, 9:21, 11:20, 12:4, 12:17, 16:12, 18:8, 23:20, 28:3, 51:13, 61:10, 61:21, 61:24, 62:4, 62:18, 63:9, 63:19, 64:4, 64:8, 68:23, 70:12, 70:15, 76:22, 104:20, 105:3, 105:12, 111:9 <b>however</b> 55:23, 68:6, 92:9, 107:2 <b>hr</b> 65:17 <b>hsinchu</b> 7:7, 7:22	<b>huang</b> 43:6, 43:9, 43:12, 43:23, 44:3 <b>huang's</b> 43:25 <b>hynix</b> 100:8, 100:13, 102:1, 102:4, 102:16, 102:20, 102:25, 106:10 <hr/> <b>I</b> <hr/> <b>i'll</b> 8:8, 8:12, 56:9, 85:2 <b>i've</b> 54:5, 66:17, 72:25, 79:5, 113:6 <b>idaho</b> 18:15, 18:17, 18:24, 19:11, 19:14, 19:18, 85:8, 85:11, 87:15, 87:21, 87:25, 91:1, 92:23, 95:22 <b>idea</b> 13:24, 14:7, 31:16, 62:9, 95:2, 96:17 <b>identification</b> 4:9, 4:13, 4:17, 45:21, 54:2, 56:5 <b>identified</b> 81:10, 107:15 <b>identify</b> 12:24, 13:17, 67:13, 73:25, 74:6, 99:16 <b>ignore</b> 107:7 <b>improvement</b> 22:11, 98:13 <b>in-house</b> 3:34, 3:35
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USD-0351637



## CONFIDENTIAL - ATTORNEYS' EYES ONLY

Transcript of Stephen Chen

Conducted on July 10, 2018

128

<b>inc</b> 1:4, 3:2, 5:4, 93:24, 95:22, 96:4	86:18, 86:21, 86:22, 86:23, 86:25, 87:4, 87:9, 88:21, 89:23, 99:22, 99:24, 100:1, 100:18	<b>interpretation</b> 89:14, 113:8	<b>into</b> 22:10, 26:10, 56:23, 57:14, 99:9, 110:18
<b>include</b> 50:2, 77:8, 77:12, 79:15	<b>initial</b> 85:9, 99:23	<b>interpreter</b> 3:32, 3:33, 6:13, 6:15, 7:6, 7:15, 7:17, 7:18, 8:19, 9:16, 9:18, 10:1, 10:25, 23:22, 25:14, 26:2, 26:3, 26:10, 26:17, 26:19, 26:21, 26:23, 27:5, 27:14, 27:15, 32:20, 34:18, 35:2, 35:6, 36:6, 36:13, 36:17, 36:21, 36:24, 37:13, 37:15, 38:5, 39:2, 39:22, 40:11, 41:6, 41:12, 42:8, 43:7, 43:14, 43:16, 45:3, 45:8, 45:10, 45:12, 46:18, 47:18, 49:17, 51:22, 53:11, 53:12, 61:15, 72:21, 77:3, 78:3, 83:21, 88:6, 89:13, 92:4, 94:2, 94:4, 94:15, 95:7, 98:2, 105:9, 113:5	<b>introduce</b> 72:5
<b>included</b> 80:3, 100:18, 105:17	<b>initially</b> 75:8	<b>interpreters</b> 5:25	<b>introduced</b> 84:25
<b>includes</b> 48:9, 58:2, 58:11, 79:2	<b>input</b> 74:7	<b>interview</b> 11:11, 69:19, 69:23	<b>introduction</b> 73:2, 86:13
<b>including</b> 14:9, 48:1, 53:1, 80:9, 84:13, 106:4, 106:10	<b>inside</b> 10:21	<b>interviews</b> 70:2, 70:4	<b>inventor</b> 22:18
<b>indeed</b> 82:24	<b>instruct</b> 48:22, 51:21, 62:21, 109:13		<b>investigate</b> 112:8, 112:15
<b>indicated</b> 4:4, 6:18, 38:6, 100:22	<b>instructing</b> 48:20		<b>investigation</b> 9:12, 9:17, 10:3, 111:6, 111:7, 111:8, 111:13, 112:11, 112:12, 112:23, 112:24
<b>indicted</b> 110:22	<b>instruction</b> 52:1, 62:24		<b>invoked</b> 109:21
<b>indictment</b> 111:2	<b>instruments</b> 16:23, 17:2, 17:4, 17:11		<b>involve</b> 98:24
<b>individual</b> 43:4, 43:5, 54:15, 81:20, 108:13, 110:17	<b>integrate</b> 22:9		<b>involved</b> 17:10, 32:17, 33:4, 33:5, 33:9, 33:11, 33:13, 33:16, 40:7, 42:20, 42:23, 43:1, 47:25, 48:10, 50:17, 57:3, 58:23, 59:12, 59:21, 60:7, 68:14, 68:18, 70:3, 72:11, 73:21, 75:9, 86:21, 88:5, 98:12, 98:13, 98:16, 99:8, 111:20, 112:1
<b>individuals</b> 42:25, 49:2, 80:8, 80:19, 80:25, 81:3, 81:5, 82:6, 103:19, 110:4	<b>integrated</b> 1:11, 40:21, 44:16		<b>involvement</b> 13:1, 40:5, 74:1, 74:9, 84:24
<b>industry</b> 21:22, 23:2, 26:13, 27:8, 27:11, 54:12, 72:5	<b>integration</b> 22:4, 22:6, 22:8, 22:9, 23:7, 27:21, 27:22, 28:12, 40:22, 85:12, 111:20		<b>involves</b> 41:25
<b>information</b> 48:17, 63:3, 65:10, 68:7, 68:10, 68:12, 73:22, 74:7, 74:10, 75:20,	<b>intellectual</b> 10:18, 96:3		
	<b>interest</b> 71:14, 114:12		
	<b>interested</b> 69:6, 78:19		
	<b>interests</b> 101:5, 109:19		
	<b>internal</b> 99:13		
	<b>interpret</b> 26:10		

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

USD-0351638

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Transcript of Stephen Chen

Conducted on July 10, 2018

129

<b>involving</b> 74:2 <b>ips</b> 53:8 <b>island</b> 16:1 <b>isn't</b> 77:22 <b>issue</b> 10:21, 109:18 <b>issues</b> 48:2, 48:3, 92:7 <b>it's</b> 9:11, 10:17, 11:4, 14:23, 15:20, 15:25, 22:7, 24:12, 27:5, 27:19, 30:2, 30:12, 31:12, 41:21, 44:8, 45:9, 45:12, 54:19, 54:20, 58:25, 66:22, 77:15, 77:20, 80:5, 83:11, 84:18, 94:10, 109:22 <b>items</b> 50:2 <b>itinerary</b> 67:14 <b>its</b> 14:4, 48:19, 50:22, 51:5, 51:18, 52:16, 57:24, 73:10, 76:17, 77:25, 114:12 <b>itself</b> 53:20, 53:23 <b>ix</b> 31:16	<b>jade</b> 1:33, 2:12, 5:12, 114:2, 114:17 <b>japan</b> 28:1, 29:10, 53:6, 53:7, 75:15, 85:6, 85:12, 91:12, 91:14, 93:17, 93:19, 93:21, 93:23, 94:1, 94:8, 94:12, 94:14, 94:21, 94:23, 95:11, 97:8, 97:14, 97:16 <b>japanese</b> 95:12 <b>jeff</b> 64:23, 66:11, 81:15 <b>jennifer</b> 64:24, 66:11, 69:25 <b>jhicc</b> 55:3, 55:13, 73:2 <b>jhicc's</b> 55:15 <b>jinhua</b> 1:10, 18:1, 41:25, 44:15, 44:16, 44:18, 44:22, 45:1, 45:2, 46:9, 46:12, 46:17, 46:21, 47:1, 47:5, 47:10, 47:13, 47:15, 47:24, 48:1, 48:15, 48:17, 48:19, 49:2, 50:8, 50:13, 50:14, 50:19, 50:21, 50:22, 50:25, 51:5, 51:8, 51:9,	51:11, 51:15, 51:17, 52:3, 52:5, 52:8, 52:9, 52:22, 53:24, 54:13, 55:9, 55:21, 56:3, 56:20, 56:24, 57:18, 57:23, 58:10, 58:22, 59:14, 62:19, 63:5, 63:8, 63:10, 63:19, 64:5, 64:9, 64:11, 65:25, 66:4, 66:8, 66:13, 67:11, 67:23, 71:14, 71:24, 72:6, 72:12, 72:14, 74:13, 74:19, 74:21, 74:24, 75:3, 76:5, 76:16, 76:21, 77:7, 77:9, 77:18, 77:19, 77:24, 78:1, 78:7, 78:10, 78:17, 79:1, 79:23, 80:9, 80:16, 81:18, 82:1, 82:4, 87:1 <b>jinhua's</b> 55:20, 67:18, 72:4, 79:22, 80:11, 80:12, 80:17, 80:24 <b>jinjiang</b> 47:16, 47:19, 80:13 <b>job</b> 17:25, 22:25, 23:1, 23:15, 25:19, 26:14, 27:10, 28:6, 29:20, 34:7, 34:16, 38:21, 45:1, 47:23,	51:8, 67:11, 77:10, 77:12, 77:13, 77:15, 77:17, 78:12, 78:18, 78:20, 78:22, 79:23 <b>johnson</b> 3:22, 3:24, 4:37, 5:20, 5:21, 5:23, 6:11, 11:14, 13:9, 13:11, 14:18, 16:17, 16:20, 17:6, 21:13, 21:15, 21:19, 30:1, 31:22, 33:7, 37:22, 45:9, 48:16, 51:20, 52:2, 52:6, 58:4, 58:25, 59:4, 62:7, 62:21, 63:1, 63:14, 63:18, 63:22, 63:25, 64:2, 69:12, 78:14, 85:1, 85:17, 88:1, 88:19, 89:3, 90:11, 91:2, 91:22, 95:23, 96:6, 97:1, 97:2, 97:24, 98:6, 102:23, 105:11, 105:18, 105:22, 109:13, 109:24, 110:1, 113:15, 113:19 <b>join</b> 28:7, 36:20, 37:11, 37:15 <b>joined</b> 17:25, 23:23, 25:20, 26:4, 37:1, 37:7, 38:8, 41:10, 70:22, 103:21, 103:22, 110:10
<b>J</b>			
<b>j-i-n-j-i-a-n-g</b> 47:19 <b>j-u-s-u-n-g</b> 53:9			

PLANET DEPOS

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USD-0351639

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## CONFIDENTIAL - ATTORNEYS' EYES ONLY

Transcript of Stephen Chen

Conducted on July 10, 2018

130

<b>joint</b> 17:3, 17:10, 23:25, 29:22, 30:2, 30:3, 30:7, 30:20, 51:19, 52:18, 52:24, 53:18, 57:25, 58:11, 63:7, 63:10, 66:6, 66:14, 68:9, 74:13, 74:16, 76:1, 76:24, 82:20, 86:11, 86:16, 86:24, 87:4, 110:9, 110:12, 110:15 <b>jointly</b> 56:25 <b>jones</b> 3:4, 3:10, 3:16, 5:16, 5:19 <b>jp</b> 95:11 <b>jsc</b> 75:17 <b>jt</b> 103:24, 110:6, 110:8, 110:10, 110:21, 111:9, 111:11, 111:14, 111:18, 111:19, 112:3, 112:9, 112:16 <b>july</b> 1:26, 5:6, 36:12, 36:13, 44:10, 114:14 <b>june</b> 19:3, 19:4, 19:5 <b>junior</b> 5:20 <b>jurisdictional</b> 54:9, 56:11 <b>just</b> 11:18, 24:14, 34:10, 43:3,	52:7, 66:10, 79:6, 82:6, 82:23, 95:2, 101:4, 106:25 <b>jusung</b> 53:8 <hr/> <b>K</b> <hr/> <b>kaohsiung</b> 15:17, 15:21, 15:24 <b>kay</b> 3:3, 5:18 <b>kenny</b> 110:17, 110:21, 112:18, 112:21, 112:22, 112:24, 113:2, 113:11 <b>kept</b> 10:2, 89:23, 92:1 <b>keynote</b> 67:22 <b>keyuan</b> 7:7 <b>kind</b> 10:21, 22:10, 24:12, 65:16, 75:4, 84:1, 92:14 <b>king</b> 1:33, 2:12, 5:12, 114:2, 114:17 <b>kla</b> 49:7, 50:11, 58:19, 80:3, 86:3, 86:16, 86:23 <b>kla-tencor</b> 53:6 <b>knew</b> 67:2, 84:23 <b>know</b> 8:17, 8:18, 10:4, 19:15, 19:19, 33:9, 44:3, 44:5,	51:13, 56:2, 57:10, 62:8, 62:18, 65:12, 67:1, 69:13, 71:18, 71:19, 71:20, 72:16, 72:18, 78:16, 83:19, 83:22, 85:3, 85:7, 87:16, 87:19, 89:8, 89:11, 89:19, 89:25, 92:13, 93:6, 93:11, 94:20, 95:9, 98:15, 102:11, 108:1, 108:9, 111:6, 111:11, 112:10, 112:21, 112:22 <b>knowledge</b> 13:21, 13:25, 14:4, 14:13, 14:24, 15:3, 15:7, 51:4, 51:7, 51:16, 52:3, 57:13, 63:19, 66:3, 69:22, 70:6, 70:24, 71:3, 93:9, 93:13, 96:2, 108:16 <b>korea</b> 53:8, 53:13 <b>korean</b> 53:9, 75:16 <b>kpi</b> 34:10, 34:21, 34:24 <b>kpis</b> 34:19 <b>kuo</b> 69:25 <hr/> <b>L</b> <hr/> <b>l-i-a-n-g</b> 40:12 <b>l-i-a-o</b> 40:13	<b>l-o-u-i-s</b> 41:4 <b>lab</b> 25:15 <b>laboratory</b> 25:9, 25:12 <b>labs</b> 101:12 <b>lack</b> 69:12, 78:14 <b>lam</b> 49:4, 50:11, 53:6, 58:16, 80:3, 87:2, 87:3 <b>laptops</b> 14:11, 14:25 <b>last</b> 9:12, 11:23, 11:25, 12:1, 13:8, 35:23, 35:25, 36:5, 36:7, 40:12, 41:5, 41:13, 43:9, 45:20, 46:1, 55:12, 61:16, 67:21, 78:4, 86:1, 110:24 <b>late</b> 110:10 <b>later</b> 39:7, 39:8, 108:5 <b>law</b> 3:24, 5:21, 5:23 <b>lawyer</b> 11:11, 11:13 <b>lawyers</b> 11:18 <b>layout</b> 61:13, 61:17, 100:2, 102:21, 102:25, 109:6 <b>layouts</b> 106:5 <b>leader</b> 100:5
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USD-0351640



## CONFIDENTIAL - ATTORNEYS' EYES ONLY

Transcript of Stephen Chen

Conducted on July 10, 2018

131

<b>learned</b> 110:24 <b>least</b> 61:23, 92:16 <b>leave</b> 36:11, 36:18, 36:20, 54:1, 90:16 <b>lee</b> 103:24, 104:4, 104:6, 110:14 <b>left</b> 23:23, 31:10, 44:10, 70:21, 84:25, 93:6, 93:12, 96:12 <b>legal</b> 96:7, 102:7, 109:11, 109:16 <b>less</b> 12:18, 61:12, 104:23, 105:17, 110:3 <b>let</b> 31:19, 51:16, 65:20, 66:25, 70:14, 76:10, 81:8, 84:20, 85:15, 107:22, 109:3, 112:24, 113:10 <b>let's</b> 17:18, 26:7, 35:15 <b>liao</b> 40:10, 40:13, 40:15 <b>licensed</b> 29:17 <b>like</b> 6:2, 25:21, 26:12, 50:2, 65:5, 71:17, 72:9, 79:13, 80:10, 83:2, 83:25, 87:10, 101:23, 101:24, 102:21, 104:3	<b>likely</b> 87:25, 90:25 <b>likewise</b> 8:12 <b>limited</b> 63:2 <b>lin</b> 1:20, 2:3, 3:35, 12:9 <b>line</b> 30:10, 54:25 <b>link</b> 95:13 <b>list</b> 91:25, 92:11, 92:13, 92:15, 92:16 <b>listed</b> 78:21 <b>lists</b> 80:7 <b>litigation</b> 13:3, 13:6, 13:19 <b>little</b> 17:19, 26:8, 37:22, 50:20, 104:16 <b>lived</b> 7:8, 7:15, 7:18 <b>located</b> 15:22, 19:18, 36:9, 47:15, 49:16, 49:20, 72:23, 75:14, 75:15, 87:21, 89:10, 89:21, 92:22 <b>location</b> 7:23, 89:18 <b>logic</b> 24:6, 24:7, 62:15 <b>logics</b> 84:13 <b>long</b> 7:8, 12:4, 12:17, 23:20,	28:3 <b>longer</b> 55:20 <b>look</b> 51:11, 55:11, 56:12, 56:15, 69:6, 77:21, 80:23, 85:25 <b>looking</b> 71:17, 82:7, 107:4 <b>looks</b> 73:2, 80:10 <b>lot</b> 62:16, 65:17, 101:4, 106:9 <b>louis</b> 41:4 <b>low-level</b> 104:15 <b>ltd</b> 1:12 <b>lu</b> 83:5 <b>lucas</b> 3:34, 12:9 <b>lucky</b> 18:18 <b>lunch</b> 12:7 <b>lunchtime</b> 67:12 <hr/> <b>M</b> <hr/> <b>m</b> 44:6, 44:7, 113:23 <b>m-a-s-k</b> 24:16 <b>m-u</b> 40:12 <b>ma</b> 101:11 <b>made</b> 13:17, 17:20, 17:23, 42:13, 50:14, 82:8, 109:22	<b>magnet</b> 27:6 <b>mail</b> 94:22, 94:25, 95:10 <b>mailing</b> 94:14, 95:3 <b>main</b> 3:32, 6:12, 7:17, 9:18, 25:14, 26:3, 26:19, 26:23, 27:15, 36:6, 37:16, 39:22, 40:11, 41:6, 41:12, 42:8, 43:7, 43:14, 43:16, 45:3, 45:8, 45:10, 45:12, 47:18, 51:22, 53:12, 72:21, 77:3, 83:21, 94:2, 95:7, 99:15, 105:9 <b>mainland</b> 44:9, 47:21, 71:5, 72:9, 72:11 <b>mainly</b> 34:18, 50:14, 50:22, 81:6, 82:3, 91:11, 94:12, 99:2, 99:21 <b>mainstream</b> 37:17 <b>maintenance</b> 53:21 <b>major</b> 34:23, 47:25 <b>majority</b> 48:14 <b>make</b> 12:23, 13:15, 16:20, 18:6, 25:21, 27:6, 33:10, 72:15
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PLANET DEPOS

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USD-0351641

## CONFIDENTIAL - ATTORNEYS' EYES ONLY

Transcript of Stephen Chen

Conducted on July 10, 2018

132

<b>making</b> 99:8	89:22, 103:15, 103:17, 104:20, 105:3, 105:12, 109:8	58:3, 58:12, 58:14, 80:4, 82:12, 82:20, 83:10, 83:12, 83:13, 83:24, 84:10, 84:18	<b>member</b> 92:15
<b>manage</b> 34:18	<b>march</b> 47:2, 47:4, 60:2	<b>matter</b> 5:4, 9:10	<b>members</b> 92:12, 95:19
<b>manager</b> 22:3, 22:20, 22:21, 27:2, 28:11, 28:19, 28:21, 29:4	<b>mario</b> 3:23, 5:22, 11:15, 11:16, 12:9, 12:16	<b>matters</b> 10:14	<b>memory</b> 24:7, 24:13, 24:19, 24:20, 27:22, 34:1, 41:21, 41:22, 41:23, 44:8, 77:1
<b>managerial</b> 46:3	<b>marked</b> 4:8, 4:12, 4:16, 4:21, 4:25, 4:29, 4:33, 45:18, 45:21, 54:2, 54:6, 56:5, 56:8, 64:13, 64:14, 66:18, 66:19, 73:1, 73:6, 79:6, 79:8	<b>may</b> 14:10, 42:13, 45:3, 45:8, 50:2, 56:19, 56:24, 57:14, 60:6, 64:23	<b>mentioned</b> 32:13, 41:18, 110:6
<b>managers</b> 35:7, 35:9, 104:16	<b>mask</b> 24:7, 24:8, 24:9, 24:12, 24:16, 24:18, 24:19	<b>maybe</b> 10:17, 12:6, 12:18, 16:24, 23:23, 25:3, 34:14, 44:1, 72:18, 104:24	<b>merge</b> 31:3
<b>managing</b> 35:7	<b>market</b> 99:14, 100:11, 108:5	<b>mean</b> 8:2, 22:2, 22:6, 48:4, 65:25, 73:15, 91:10, 95:1, 95:3, 103:7, 104:21, 108:3	<b>met</b> 49:4, 49:7, 49:9
<b>mandarin</b> 8:18, 26:9	<b>master's</b> 19:24, 20:15, 20:16, 20:18, 20:20, 20:24, 22:13, 22:25, 23:12	<b>media</b> 5:2, 14:11, 14:17, 15:8	<b>metallurgy</b> 20:12
<b>manpower</b> 65:5, 65:13, 65:16, 65:24, 77:7, 78:1	<b>matching</b> 76:16	<b>meet</b> 11:21, 12:15	<b>microelectronics</b> 1:9, 3:21, 5:5, 8:3
<b>manufacture</b> 29:12, 30:18, 32:10, 37:4, 37:8, 74:19	<b>material</b> 20:10, 20:11, 20:12, 20:21, 20:22, 73:12, 101:11	<b>meeting</b> 11:24, 12:4, 12:5, 12:8, 12:11, 12:14, 12:17, 12:20, 19:4, 86:3, 86:5, 86:10	<b>micron's</b> 18:20, 18:23, 19:10, 35:5, 84:22, 87:14, 91:16, 93:8, 93:22
<b>manufactured</b> 30:21	<b>materials</b> 39:17, 49:9, 50:11, 53:5,	<b>meant</b> 113:6	<b>mid</b> 110:10
<b>manufacturing</b> 30:12, 30:14, 30:15, 32:6, 34:10, 34:12, 35:17, 35:20, 37:12, 48:5, 49:14, 49:24, 51:14, 65:17, 78:8, 88:10, 98:17		<b>media</b> 5:2, 14:11, 14:17, 15:8	<b>mid-level</b> 104:15
<b>many</b> 9:21, 11:20, 16:7, 16:12, 18:8, 22:8, 53:14, 61:24, 62:4, 62:18, 63:9, 63:19, 64:4, 64:8, 68:23, 70:12, 70:15, 76:22,		<b>meet</b> 11:21, 12:15	<b>midway</b> 64:18
		<b>meetings</b> 12:2, 19:9, 50:16, 50:17, 89:11, 89:22, 89:23	<b>might</b> 16:20, 90:13
			<b>milestone</b> 75:24, 76:6, 76:15, 99:3
			<b>milestones</b> 74:3
			<b>military</b> 23:12, 23:16, 23:18
			<b>minimum</b> 61:11

PLANET DEPOS

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USD-0351642



## CONFIDENTIAL - ATTORNEYS' EYES ONLY

Transcript of Stephen Chen

Conducted on July 10, 2018

133

<b>minor</b> 39:2, 46:18, 49:17, 78:3	<b>motion</b> 56:11	31:25, 32:3, 32:7, 32:10, 60:23, 60:25, 61:7, 91:12, 97:9, 97:20, 101:22, 101:24, 101:25	<b>new</b> 26:4, 33:19, 33:22, 39:9, 40:2, 52:21, 52:22, 52:23, 68:24, 102:17
<b>minus</b> 105:8, 105:10	<b>moved</b> 26:12, 69:3, 69:16	<b>nanometers</b> 61:12	<b>newly</b> 78:17
<b>minute</b> 66:24	<b>mu-liang</b> 40:10, 40:12	<b>nanometers-or-le-ss</b> 101:19	<b>news</b> 110:25
<b>misstates</b> 91:22	<b>much</b> 8:18, 52:20, 61:21, 109:1	<b>nanya</b> 27:12, 27:14, 27:18, 28:3	<b>next</b> 8:13, 25:18, 27:10, 28:6, 29:19, 38:17, 57:17, 65:4, 80:7, 83:4
<b>mitsubishi</b> 29:11, 29:17	<b>multi-day</b> 79:16	<b>necessary</b> 55:24	<b>node</b> 31:4, 31:11, 61:2
<b>ml</b> 40:16, 40:17, 40:21	<b>myself</b> 21:16, 105:17	<b>need</b> 13:11, 22:7, 24:14, 51:11, 53:25, 65:1, 68:24, 72:7, 92:9, 108:25	<b>nodes</b> 61:5
<b>mm'hm</b> 110:7	<b>N</b>	<b>needed</b> 55:24, 60:4, 69:9, 69:15	<b>non-compete</b> 44:24, 45:4, 45:14, 56:1
<b>mmt</b> 34:1	<b>n-a-n-y-a</b> 27:16	<b>needs</b> 48:13, 63:12, 69:5	<b>non-competition</b> 46:4
<b>model</b> 22:11	<b>name</b> 6:22, 6:25, 7:1, 15:24, 22:17, 23:6, 23:25, 26:15, 26:17, 33:23, 33:25, 35:1, 35:2, 35:23, 35:24, 36:5, 36:7, 40:10, 40:12, 40:13, 40:15, 41:1, 41:4, 41:5, 41:11, 41:13, 43:6, 43:8, 43:9, 43:12, 43:17, 43:20, 44:7, 44:14, 44:18, 53:3, 61:3, 71:19, 71:20, 75:16, 83:4, 83:19, 83:22, 108:13	<b>negotiating</b> 57:3, 59:12, 59:17, 60:8	<b>none</b> 51:2, 64:11, 82:7
<b>monday</b> 11:25, 12:1, 12:4, 12:5		<b>negotiation</b> 33:13, 33:16	<b>nor</b> 114:10
<b>monitor</b> 5:7		<b>neil</b> 103:24, 110:14	<b>north</b> 1:22, 2:5, 5:11, 15:22
<b>months</b> 28:5, 36:15, 36:17, 36:19, 72:2, 103:21, 103:22		<b>neither</b> 114:10	<b>northern</b> 1:2, 18:20, 79:16
<b>moore</b> 3:23, 5:22		<b>never</b> 14:14, 90:5, 90:6, 90:7, 90:17, 90:18, 90:23, 96:13, 96:14, 96:19, 96:22, 105:21, 112:6, 113:1, 113:7	<b>not</b> 6:3, 6:6, 7:20, 14:14, 15:18, 22:22, 24:15, 33:9, 33:11, 33:13, 36:24, 37:11, 37:19, 38:13, 38:16, 44:5, 48:10, 48:18, 48:20, 48:22, 50:8,
<b>more</b> 8:18, 16:14, 16:21, 34:14, 37:23, 53:1, 58:6, 70:20, 70:23, 104:23, 113:16	<b>named</b> 15:24, 22:18	<b>nevertheless</b> 6:4	
<b>morning</b> 5:18, 6:20, 6:21, 86:2	<b>names</b> 75:10, 80:7		
<b>most</b> 21:21, 36:2, 93:19, 95:19	<b>nanometer</b> 31:6, 31:8, 31:12, 31:13,		
<b>mostly</b> 91:14, 98:20, 104:15			

PLANET DEPOS

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USD-0351643



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Transcript of Stephen Chen

Conducted on July 10, 2018

134

51:8, 51:21, 52:9, 52:10, 52:20, 53:20, 54:20, 55:14, 56:3, 61:9, 62:21, 63:4, 63:5, 65:10, 66:15, 67:3, 68:5, 70:3, 71:9, 71:20, 76:13, 76:25, 78:2, 78:5, 78:9, 78:10, 80:22, 81:7, 81:15, 81:21, 82:22, 84:24, 88:3, 88:7, 88:8, 88:20, 89:24, 91:5, 91:15, 91:17, 92:12, 92:15, 92:16, 93:4, 93:11, 94:20, 95:18, 96:9, 101:5, 102:13, 103:9, 103:11, 103:12, 104:18, 105:1, 106:16, 106:24, 107:12, 107:25, 108:5, 108:7, 108:10, 108:11, 108:17, 108:19, 108:21, 108:25, 109:5, 109:9, 109:14, 109:17, 111:11, 111:12, 111:19, 112:21, 112:22, 114:9 <b>notary</b> 6:3 <b>nothing</b> 77:19, 105:22 <b>november</b> 15:13, 110:11 <b>now</b> 8:1, 40:19, 40:21, 47:6,	59:1, 70:17, 70:19, 97:10, 99:6, 103:2, 103:5, 104:21, 109:18, 111:20, 111:23, 111:24 <b>number</b> 4:22, 64:15, 76:25, 77:5, 79:12, 79:14, 80:15, 81:11, 81:20, 86:1, 111:4 <b>numbers</b> 4:26, 4:30, 4:34, 56:16, 66:20, 66:23, 73:4, 73:7, 74:5, 77:7, 79:9 <hr/> <b>O</b> <b>o-k-i</b> 28:2 <b>oaths</b> 6:2, 6:5, 6:8 <b>object</b> 6:6, 51:20, 69:12 <b>objection</b> 14:18, 14:23, 48:16, 58:4, 62:21, 78:14, 88:1, 88:19, 89:3, 90:11, 90:15, 91:2, 91:22, 95:23, 96:6, 97:18, 102:19, 105:14, 109:13 <b>obligate</b> 66:5 <b>obligation</b> 66:7 <b>observe</b> 106:25 <b>obtained</b> 22:13, 22:25, 106:18	<b>occasions</b> 9:21, 11:20, 18:14 <b>occurred</b> 86:5 <b>october</b> 18:2, 48:25, 50:7, 50:10, 67:15, 67:16, 68:23, 71:25, 72:2, 73:3, 79:17, 80:20 <b>off</b> 37:25, 48:11, 51:12, 59:5, 85:18, 113:21, 113:23 <b>offer</b> 75:2 <b>offered</b> 101:2 <b>office</b> 110:23 <b>officer</b> 46:4, 114:3 <b>official</b> 47:3 <b>officially</b> 42:3, 45:1 <b>often</b> 28:15 <b>oh</b> 11:16, 23:14, 43:14 <b>okay</b> 8:15, 8:22, 9:3, 10:11, 10:23, 11:2, 13:10, 15:23, 18:14, 19:6, 22:24, 26:11, 26:17, 27:10, 30:25, 34:15, 43:14, 45:6, 51:22, 62:11, 65:22, 81:8, 98:21, 99:6, 109:17	<b>oki</b> 28:2 <b>old</b> 52:21, 54:21 <b>once</b> 55:20, 72:8 <b>one</b> 9:23, 10:4, 10:16, 17:23, 18:1, 18:18, 22:10, 23:3, 24:12, 28:18, 34:13, 43:3, 58:14, 58:16, 58:19, 64:4, 71:4, 71:15, 72:17, 72:19, 75:12, 75:13, 75:14, 75:22, 83:2, 90:23, 92:12, 95:18, 100:3, 108:1, 108:20, 111:1 <b>one-day</b> 80:5 <b>ones</b> 113:18, 113:19 <b>only</b> 1:16, 9:8, 9:23, 11:11, 12:16, 16:5, 17:23, 18:1, 18:23, 19:3, 24:19, 25:4, 30:14, 30:15, 32:9, 40:6, 42:19, 46:15, 46:20, 47:11, 48:11, 49:19, 50:8, 50:15, 62:14, 66:15, 67:18, 71:15, 71:19, 77:8, 77:9, 77:19, 77:25, 78:18, 80:17, 83:1, 84:17, 86:13, 86:18, 86:20,
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PLANET DEPOS

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USD-0351644

## CONFIDENTIAL - ATTORNEYS' EYES ONLY

Transcript of Stephen Chen

Conducted on July 10, 2018

135

87:16, 89:6, 89:11, 89:16, 102:12, 103:21 <b>onto</b> 94:10 <b>opening</b> 78:23 <b>openings</b> 77:11, 77:12, 77:17, 78:12, 78:19, 78:20, 78:22 <b>operation</b> 34:11, 38:12, 39:21, 39:23, 40:24, 41:2, 53:21, 55:15, 74:15, 78:8 <b>operations</b> 55:20, 67:23 <b>opinion</b> 64:4 <b>opposed</b> 21:23 <b>oral</b> 82:23 <b>order</b> 13:2, 92:24, 99:16, 101:6 <b>organization</b> 71:11, 71:12 <b>original</b> 37:18 <b>other</b> 9:4, 9:5, 10:5, 10:12, 10:14, 14:11, 15:8, 37:4, 42:10, 64:4, 69:4, 75:13, 75:14, 75:20, 80:18, 81:16, 99:5, 104:8, 108:1 <b>otherwise</b> 4:4, 6:18, 8:25, 38:6, 114:12 <b>our</b> 10:20, 11:11,	44:7, 57:19, 59:19, 59:20, 60:19, 91:5, 91:11, 93:4, 93:19, 94:10, 94:19, 99:17, 99:23, 100:6, 101:5, 102:7, 106:22 <b>out</b> 22:25, 26:12, 71:15, 84:4 <b>outcome</b> 114:12 <b>outside</b> 62:3 <b>over</b> 28:13, 58:25, 69:7, 83:4, 85:15 <b>oversees</b> 40:24, 41:2 <b>own</b> 48:19, 50:22 <b>owned</b> 96:4 <b>oyster</b> 3:25 <hr/> <b>P</b> <hr/> <b>p-o</b> 43:8 <b>page</b> 45:20, 46:1, 54:14, 55:12, 56:12, 56:16, 56:17, 64:18, 64:19, 67:21, 73:1, 74:5, 74:8, 74:11, 74:14, 75:22, 75:25, 77:10, 79:20, 80:7, 82:11, 86:1 <b>pages</b> 1:32, 56:14, 74:6, 83:3 <b>paragraph</b> 64:24, 65:9	<b>parameter</b> 106:25 <b>parent</b> 30:16, 30:21 <b>part</b> 16:2, 17:14, 20:23, 23:18, 24:18, 33:3, 57:5, 59:25, 63:10, 80:21, 106:15, 106:22 <b>participate</b> 55:15, 55:20, 68:1 <b>participated</b> 82:5 <b>particular</b> 38:11 <b>parties</b> 6:2, 6:9, 54:8, 56:10, 71:22, 114:11 <b>partner</b> 50:16 <b>parts</b> 59:16, 73:24, 73:25, 74:2 <b>party</b> 52:10 <b>passed</b> 46:22 <b>password-protect-</b> <b>ed</b> 95:16, 96:12, 96:16 <b>past</b> 28:22, 85:1 <b>patents</b> 22:17 <b>patrick</b> 3:9, 5:16 <b>pattern</b> 61:11 <b>pay</b> 53:18 <b>pays</b> 47:7, 53:21, 53:23	<b>pcs</b> 94:19 <b>pending</b> 13:9, 13:13 <b>people</b> 48:11, 59:20, 68:14, 68:18, 69:3, 69:6, 69:16, 70:21, 78:2, 78:6, 78:8, 78:19, 79:22, 80:13, 81:7, 82:3, 82:4, 82:5, 82:7, 88:4, 99:5, 103:9, 103:10, 103:13, 103:15, 103:17, 104:20 <b>per</b> 72:13, 102:7 <b>percent</b> 30:23 <b>perhaps</b> 26:1 <b>period</b> 17:16, 28:25, 30:25, 35:20, 61:20, 79:17, 98:1 <b>person</b> 35:11, 39:23, 40:10 <b>personal</b> 36:15, 36:18, 36:19 <b>personally</b> 66:11, 79:24 <b>picture</b> 54:15, 54:17, 54:19, 54:20, 54:21, 54:25 <b>piece</b> 73:12 <b>place</b> 5:10, 108:25 <b>plaintiff</b> 1:5
---	---	---	--

PLANET DEPOS

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USD-0351645



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Transcript of Stephen Chen

Conducted on July 10, 2018

136

<b>plan</b> 65:5, 65:13, 65:24, 77:6, 105:19	96:20, 111:9, 112:9, 113:3, 113:13	47:5, 47:24, 51:8, 51:10, 52:3, 52:8, 55:3, 99:1, 104:12	75:2, 77:22, 79:2, 107:5, 108:14
<b>planet</b> 5:9, 5:13	<b>possible</b> 52:20, 89:18, 92:7, 104:9	<b>pretty</b> 77:15	<b>processes</b> 48:1
<b>plans</b> 50:22	<b>postgraduate</b> 22:15	<b>previously</b> 4:14, 4:18, 4:21, 4:25, 4:29, 4:33, 54:3, 56:6, 64:13, 64:14, 66:18, 66:19, 73:1, 73:6, 79:6, 79:8	<b>procurement</b> 38:24, 39:4, 39:12, 39:15, 39:18, 40:5, 40:6, 40:7, 40:8, 40:17, 40:19, 40:23, 40:24, 41:3, 48:2, 48:4, 48:5, 51:9, 51:11, 58:23, 84:14
<b>plant</b> 54:13, 55:4, 55:9	<b>power</b> 25:22, 27:6	<b>price</b> 33:14	<b>produce</b> 13:2
<b>plasma</b> 50:3	<b>powerchip</b> 10:15, 10:17, 10:20, 28:7, 28:10, 28:14, 29:1, 29:9, 29:12, 29:16, 29:19, 29:22, 30:4, 30:8, 30:17, 30:19, 30:24, 98:4, 98:7, 98:10, 98:11, 98:15, 98:18	<b>primary</b> 30:10	<b>producing</b> 31:24, 32:2
<b>please</b> 5:14, 5:25, 6:22, 31:15, 90:16	<b>preliminary</b> 76:20	<b>print</b> 61:11	<b>product</b> 23:4, 29:11, 29:17, 30:16, 30:20, 39:7, 41:9, 41:16, 60:24, 74:25, 75:4, 75:9, 75:19, 85:10, 102:18, 106:2, 112:2
<b>plus</b> 105:8, 105:10	<b>preparation</b> 73:21	<b>prior</b> 7:11, 72:2	<b>production</b> 31:12, 55:13, 55:21, 65:15, 76:13
<b>po-chien</b> 3:15	<b>prepare</b> 11:8, 11:21	<b>priority</b> 100:6	<b>products</b> 27:3, 29:9, 37:4, 55:21, 84:22, 85:4, 85:8, 93:8, 93:10
<b>po-weng</b> 43:6	<b>prepared</b> 84:16	<b>privilege</b> 109:15	<b>program</b> 20:14, 20:24
<b>point</b> 3:25, 4:3, 6:17, 32:18, 34:2, 38:6, 72:17, 106:19	<b>preparing</b> 12:22	<b>proactively</b> 71:16	<b>project</b> 39:9, 41:18, 41:19, 41:20, 41:21, 41:24, 42:2, 42:16,
<b>policy</b> 42:11, 103:6	<b>present</b> 3:30, 12:8, 50:16, 67:4, 68:3, 84:17	<b>probably</b> 57:11	
<b>portion</b> 67:16, 82:12	<b>presentation</b> 50:15, 68:2, 68:5, 72:15, 73:11, 73:13, 82:22, 83:16	<b>proceeded</b> 20:14	
<b>portions</b> 59:12	<b>president</b> 29:21, 30:7, 32:16, 32:22, 45:1, 46:9, 46:12, 46:16, 46:21, 47:1,	<b>proceeding</b> 9:5	
<b>position</b> 25:7, 26:16, 28:10, 34:5		<b>proceedings</b> 56:10	
<b>positions</b> 29:3, 80:8		<b>process</b> 21:9, 21:17, 21:25, 22:1, 22:2, 22:3, 22:5, 22:9, 22:23, 27:21, 27:22, 28:12, 29:4, 32:6, 59:21, 68:17, 74:18, 75:1,	
<b>possess</b> 107:3			
<b>possessed</b> 14:14, 14:25, 15:3, 15:8, 112:4, 112:16, 112:20			
<b>possession</b> 13:22, 14:1,			

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

USD-0351646



## CONFIDENTIAL - ATTORNEYS' EYES ONLY

Transcript of Stephen Chen

Conducted on July 10, 2018

137

42:21, 43:2, 44:6, 44:9, 50:12, 50:18, 50:21, 51:19, 52:14, 52:17, 52:18, 52:25, 53:18, 57:25, 58:11, 60:3, 60:14, 66:6, 66:14, 68:9, 68:22, 69:4, 69:7, 70:7, 76:24, 82:14, 82:19, 82:21, 82:24, 83:2, 86:11, 86:14, 86:16, 86:24, 87:5, 105:4, 105:6, 110:9, 110:13, 110:15, 111:22 <b>projects</b> 72:9, 72:12 <b>promote</b> 28:15, 28:16 <b>promoted</b> 29:5 <b>promotion</b> 28:18, 67:19 <b>prompted</b> 68:6 <b>property</b> 10:18, 96:3 <b>prosecutors</b> 110:22 <b>provide</b> 9:14, 9:21, 11:8, 13:5, 19:20, 51:17, 57:19, 66:12, 82:19, 84:4, 106:7, 106:13, 107:9 <b>provided</b> 9:5, 10:13, 57:23, 58:10, 82:24, 87:3, 88:25, 106:3,	107:8, 109:12 <b>provides</b> 48:14, 52:5 <b>providing</b> 8:9 <b>province</b> 47:16 <b>public</b> 6:4, 42:11, 42:12 <b>publish</b> 21:1 <b>pure</b> 62:14, 62:15 <b>purports</b> 54:9 <b>purpose</b> 77:25, 103:9, 103:12, 108:18 <b>pursuant</b> 2:12 <hr/> <b>Q</b> <b>q&amp;a</b> 68:6, 68:11 <b>quality</b> 34:23 <b>quanzhou</b> 80:13 <b>question</b> 8:11, 8:13, 8:24, 8:25, 9:1, 13:9, 14:22, 32:21, 48:23, 58:9, 58:24, 64:7, 65:20, 70:14, 73:14, 81:8, 86:15, 94:3, 107:22, 109:20, 112:13, 113:10 <b>question's</b> 13:12, 14:18 <b>questions</b> 8:9, 8:20, 11:19, 14:8, 48:21, 59:2, 63:13, 79:7,	87:2, 96:25, 97:1 <b>quick</b> 17:9, 64:22 <b>quit</b> 25:20, 26:4 <hr/> <b>R</b> <b>r&amp;d</b> 59:21, 61:21, 68:15, 68:18, 68:25, 69:4, 69:6, 69:17, 76:4, 76:17, 76:19, 78:9, 83:24, 84:2, 84:9, 91:16, 91:18, 91:24, 92:3, 92:9, 92:20, 92:21, 93:1, 98:16, 98:19 <b>r-o-m</b> 24:19 <b>raid</b> 105:19 <b>randall</b> 3:3 <b>randy</b> 5:18 <b>ratio</b> 30:22 <b>reach</b> 68:25 <b>reactors</b> 50:3 <b>read</b> 24:19, 45:24, 65:9 <b>reading</b> 114:9 <b>reads</b> 55:1, 55:12, 65:4 <b>real</b> 17:9, 64:21 <b>really</b> 80:23, 94:11,	95:12 <b>reason</b> 61:3, 71:23, 91:20 <b>reasons</b> 90:23, 108:21 <b>recall</b> 7:20, 10:7, 10:24, 19:1, 19:7, 36:24, 46:25, 76:25, 82:22, 101:18 <b>receive</b> 47:9, 84:1 <b>received</b> 47:12, 52:13 <b>recommendation</b> 72:13 <b>record</b> 6:23, 16:20, 38:1, 38:4, 59:6, 59:9, 64:20, 73:4, 79:11, 85:19, 85:22, 109:18, 113:22, 113:23, 114:5 <b>recorded</b> 9:24 <b>recording</b> 9:25, 10:2 <b>recruit</b> 65:3, 65:6, 78:2, 78:6, 81:7 <b>recruiting</b> 48:9, 63:2, 63:12, 66:5, 66:9, 66:13, 77:6, 77:25 <b>recruitment</b> 48:10, 65:2 <b>reduced</b> 114:8 <b>refer</b> 19:17, 64:17, 77:7, 92:20 <b>referred</b> 65:12
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PLANET DEPOS

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USD-0351647

## CONFIDENTIAL - ATTORNEYS' EYES ONLY

Transcript of Stephen Chen

Conducted on July 10, 2018

138

<b>referring</b> 11:13, 18:2, 34:25, 44:15, 44:20, 46:8, 69:1, 70:8, 70:9, 76:3, 81:1, 82:17, 83:18, 91:9, 93:23, 93:25, 94:22, 94:25, 95:1, 97:10 <b>reflected</b> 59:23 <b>reflects</b> 79:20 <b>regarding</b> 42:10, 42:21, 43:2, 68:7, 68:12, 93:14, 99:14, 100:1, 102:12, 108:22, 110:12 <b>relate</b> 84:10 <b>related</b> 13:6, 14:6, 56:25, 57:19, 59:22, 87:4, 87:23, 89:1, 90:18, 90:25, 93:7, 93:9, 94:8, 114:10 <b>relates</b> 63:3, 109:15 <b>relating</b> 9:10, 13:22, 14:1, 14:9, 14:15, 86:23, 90:4, 90:8 <b>relations</b> 104:13, 104:17 <b>release</b> 46:3 <b>remain</b> 56:3 <b>remainder</b> 56:13 <b>remained</b> 33:19	<b>remember</b> 18:9, 19:3, 21:4, 22:19, 72:8, 81:15 <b>renamed</b> 33:22 <b>rendition</b> 94:16 <b>repeat</b> 31:14, 34:13 <b>repeating</b> 83:22 <b>report</b> 34:9, 35:9, 101:4, 110:25 <b>reported</b> 1:33, 35:16, 39:1, 39:6, 39:8, 39:9, 84:14 <b>reporter</b> 5:12, 5:24, 6:1, 6:3, 6:5, 12:10, 17:1, 17:5, 20:11, 21:5, 24:10, 24:14, 24:17, 24:21, 25:23, 26:1, 27:13, 28:17, 29:24, 31:14, 31:20, 45:11, 45:15, 95:4, 113:17, 114:1, 114:3 <b>reporting</b> 111:19 <b>reports</b> 39:24, 100:19, 101:6, 102:12, 106:10, 106:12, 106:15, 107:7, 107:9, 111:18 <b>represent</b> 5:15, 54:6, 56:9 <b>represented</b> 52:11 <b>requested</b> 114:9	<b>requires</b> 65:15 <b>research</b> 49:5, 50:11, 51:18, 52:17, 53:6, 57:19, 57:24, 58:16, 76:13, 76:23, 78:13, 80:3, 87:3 <b>resolution</b> 46:7, 46:14, 46:22 <b>resolved</b> 46:3 <b>respect</b> 87:2 <b>responsibilities</b> 34:7, 34:16, 38:22, 39:14, 39:19, 47:24 <b>responsibility</b> 39:17, 48:8, 78:25 <b>responsible</b> 41:19, 59:17, 74:21, 83:11, 83:14, 105:7 <b>restate</b> 70:14 <b>restriction</b> 44:25, 45:4, 45:14, 56:1 <b>restrictions</b> 46:4 <b>result</b> 76:1 <b>results</b> 76:20 <b>resume</b> 71:5, 71:6, 71:9, 71:10 <b>resumes</b> 70:1 <b>retention</b> 33:17 <b>return</b> 27:7, 53:25	<b>reverse</b> 100:25, 102:13 <b>reverse-engineer</b> 101:13, 102:1, 102:6, 102:14, 107:13, 107:18, 108:19, 108:21 <b>reverse-engineer-</b> <b>ed</b> 102:4, 108:17 <b>reverse-engineer-</b> <b>ing</b> 100:11, 100:23, 101:8, 101:9, 102:9, 106:10, 106:19, 107:1, 107:5, 107:21, 107:24, 108:6 <b>review</b> 12:12, 12:19 <b>rexchip</b> 30:3, 30:7, 30:13, 30:18, 31:1, 31:5, 31:24, 32:2, 32:5, 32:9, 32:14, 32:16, 32:22, 32:25, 33:22, 54:18, 54:24, 91:14, 91:15, 97:3, 97:7, 98:22 <b>rexchip's</b> 30:10 <b>right</b> 40:19, 45:7, 56:15, 59:4, 63:22, 74:5, 74:14, 77:11, 85:17, 97:25, 99:24, 100:22, 105:2, 105:12, 109:18 <b>road</b> 1:22, 2:5, 3:17, 5:11, 7:7, 7:19 <b>roadmap</b> 75:23, 75:25,
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USD-0351648



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Conducted on July 10, 2018

139

76:6, 76:12, 76:16 <b>role</b> 17:24, 46:25 <b>rom</b> 24:8, 24:9, 24:19 <b>roughly</b> 16:15, 19:3, 25:4, 110:16 <b>row</b> 22:10, 82:13 <b>rule</b> 100:2, 106:23, 106:24, 107:3, 107:6 <b>rules</b> 106:4, 106:14, 106:16, 106:18 <b>run</b> 71:11	<b>samsung</b> 100:4, 100:5, 100:6, 101:13, 102:15, 102:20, 102:25, 106:11, 108:25 <b>san</b> 3:6, 3:12, 3:26, 18:12, 18:15, 18:18 <b>sandy</b> 69:25 <b>saturday</b> 67:15 <b>saw</b> 73:18, 83:2, 95:10 <b>say</b> 8:2, 17:1, 21:5, 21:21, 22:1, 24:10, 28:17, 35:14, 42:7, 42:8, 62:14, 69:9, 78:12, 87:24, 93:22, 103:11 <b>saying</b> 31:20, 91:19, 104:3 <b>says</b> 21:11, 46:2, 57:17, 67:22, 73:2, 77:10, 79:21, 82:14, 83:16, 95:10 <b>schedule</b> 79:15, 79:19, 80:5, 83:2 <b>scheduled</b> 86:2 <b>school</b> 19:21 <b>science</b> 20:10, 20:11, 20:12, 20:21, 20:22 <b>scope</b> 52:3, 52:9	<b>screen</b> 53:7 <b>sec</b> 56:13, 56:14 <b>second</b> 7:6, 24:18, 29:24, 47:11, 47:12, 64:24, 76:19, 85:2 <b>secret</b> 110:23 <b>section</b> 3:17, 67:19, 68:6 <b>see</b> 10:6, 16:10, 17:18, 31:19, 46:5, 55:5, 55:17, 56:20, 57:1, 57:21, 64:21, 65:8, 67:3, 67:24, 73:19, 76:8, 77:11, 82:15, 83:5, 85:16, 86:3, 90:4, 90:17, 93:20, 106:20 <b>seen</b> 67:1, 73:9, 73:14, 90:8, 90:12, 90:18, 90:20, 90:24, 96:19, 96:22 <b>sell</b> 30:16, 30:21 <b>semiconductor</b> 21:10, 21:18, 21:22, 23:2, 25:20, 26:13, 27:8, 27:9, 27:11, 48:6, 49:13, 49:25, 62:13, 65:7, 71:21, 81:11, 81:19 <b>send</b> 25:15	<b>senior</b> 25:8, 25:11, 28:22, 29:6, 38:10, 38:11, 38:13, 38:15, 38:19, 38:22, 40:23, 41:1, 50:23, 51:3, 83:17 <b>sent</b> 34:11 <b>sentence</b> 55:12, 56:22, 57:17, 61:16, 65:4, 78:4 <b>separate</b> 74:22 <b>separately</b> 52:11 <b>september</b> 36:23, 36:25, 37:1, 37:7, 37:20, 38:8, 40:9, 41:10 <b>series</b> 84:22, 85:3, 85:7, 93:8, 93:10, 93:12 <b>served</b> 23:16, 52:11 <b>server</b> 94:20 <b>servers</b> 94:10, 94:21 <b>service</b> 23:13, 71:10, 71:12, 74:24, 75:6, 75:8, 75:18 <b>session</b> 68:11 <b>set</b> 21:16, 60:12, 114:13 <b>seventeen</b> 10:11 <b>seventh</b> 7:19
<b>S</b>			
<b>s</b> 95:22 <b>s-c-r-e-e-n</b> 53:7 <b>s-r</b> 41:13 <b>s-ram</b> 24:8 <b>said</b> 55:16, 60:7, 72:8, 72:17, 105:16, 106:1, 114:6 <b>salary</b> 47:7 <b>sales</b> 65:17, 83:5, 83:10, 84:3, 84:7, 84:18, 84:19, 98:17 <b>same</b> 7:23, 72:5, 72:12, 87:2, 113:18, 113:19, 113:20			

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USD-0351649



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Transcript of Stephen Chen

Conducted on July 10, 2018

140

<b>sf</b> 108:15 <b>share</b> 30:22, 87:9 <b>shareholder</b> 72:14 <b>shareholders</b> 80:11, 80:12, 80:16, 80:18 <b>sharepoint</b> 87:10, 87:17, 87:18, 88:21, 89:7, 89:11, 89:12, 89:17, 89:24, 89:25, 92:1, 92:9, 92:11, 92:14, 92:18, 95:15 <b>sheet</b> 56:12 <b>short</b> 37:23, 86:13 <b>shorthand</b> 114:1, 114:2 <b>should</b> 31:16, 46:13, 60:2, 72:12, 72:22, 77:1, 94:2 <b>shouldn't</b> 102:11 <b>show</b> 76:13, 84:5 <b>showing</b> 77:17 <b>shows</b> 76:11, 76:12, 106:15 <b>shrink</b> 60:20 <b>sic</b> 20:1, 72:3, 72:8, 99:22 <b>side</b> 21:23, 21:24, 59:19, 59:21, 74:14, 77:11 <b>sign</b> 48:11, 51:12,	57:6 <b>signature-ehcjh</b> 114:15 <b>signed</b> 57:9 <b>signing</b> 114:9 <b>silicon</b> 23:7 <b>similar</b> 75:5, 78:21, 102:5, 102:22 <b>since</b> 17:19, 59:20, 72:4, 96:12 <b>singapore</b> 36:10, 89:10, 89:21, 89:24, 90:10 <b>sis</b> 23:7, 23:8, 23:10, 23:20, 24:3 <b>site</b> 34:6, 34:8, 34:17, 35:4, 35:7, 35:13, 88:10, 93:21, 94:12, 95:15, 95:16 <b>sites</b> 87:10 <b>six</b> 72:2, 103:21, 103:22 <b>size</b> 60:22, 61:1, 61:6, 102:22 <b>skill</b> 84:19 <b>slightly</b> 104:23 <b>slot</b> 82:13 <b>sm</b> 53:10 <b>smc</b> 72:3, 72:17	<b>smg</b> 72:8, 72:18 <b>soft</b> 27:6 <b>software</b> 21:23 <b>solely</b> 63:16 <b>some</b> 10:21, 11:10, 16:17, 34:10, 46:13, 46:20, 61:11, 62:1, 62:3, 66:12, 68:7, 68:12, 70:1, 70:10, 73:24, 76:20, 78:1, 79:25, 83:23, 84:1, 85:15, 89:10, 97:1, 100:23, 102:8, 103:19, 107:3, 108:4, 108:22 <b>somebody</b> 57:11, 62:14, 112:7, 112:14 <b>someone</b> 108:5 <b>something</b> 23:7, 39:8, 39:9, 101:23, 101:24, 102:11 <b>sometimes</b> 71:11 <b>sorry</b> 17:1, 25:23, 27:13, 39:2, 46:18, 49:17, 61:15, 88:6, 89:13, 92:4, 92:5, 94:15, 95:4, 105:9, 113:5 <b>sort</b> 80:23 <b>sounds</b> 26:12	<b>source</b> 74:10, 75:21, 89:1, 89:8, 89:18, 89:19, 94:11, 112:3, 112:8, 112:15, 112:19, 113:2, 113:12 <b>sourcing</b> 39:16 <b>south</b> 3:17, 3:26, 15:17, 15:18, 15:21, 15:25, 16:1 <b>southern</b> 16:2 <b>speak</b> 67:7, 68:4, 68:5 <b>speaker</b> 67:22 <b>specializes</b> 62:14 <b>specific</b> 38:16 <b>specificity</b> 69:13 <b>speculating</b> 90:13 <b>speculation</b> 78:15, 88:2, 88:19, 89:4, 90:12, 91:3, 96:7, 97:19, 105:15 <b>speech</b> 81:23, 81:24, 82:8 <b>spell</b> 35:25 <b>spelling</b> 9:19, 26:20, 26:24, 27:16, 36:4, 36:7, 40:12, 41:7, 41:13, 43:8, 43:9, 43:17,
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USD-0351650

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Transcript of Stephen Chen

Conducted on July 10, 2018

141

47:19 <b>spoke</b> 95:7 <b>spoken</b> 7:13, 7:16, 26:3, 32:19, 36:16, 43:13, 45:10, 51:23, 51:24, 54:18, 62:23, 71:8, 98:3, 109:2 <b>sputter</b> 21:4, 21:15 <b>sputtering</b> 21:12, 21:13, 21:19 <b>square</b> 60:22 <b>sr</b> 41:11 <b>staff</b> 80:18 <b>staffing</b> 48:2, 48:8, 59:19, 59:22 <b>stamp</b> 79:11 <b>stand</b> 44:6, 60:21 <b>standard</b> 77:15, 78:18 <b>stands</b> 44:8, 60:23, 71:18 <b>start</b> 21:17, 22:24, 28:11, 31:8, 36:22, 42:2, 42:5, 110:8, 110:15 <b>start-up</b> 26:5 <b>started</b> 29:4, 40:9, 46:25, 47:11, 99:6 <b>starting</b> 42:23, 51:10,	79:14, 79:20 <b>starts</b> 79:22 <b>state</b> 5:15, 6:22, 90:15 <b>statement</b> 57:15 <b>states</b> 1:1, 16:6, 16:9, 16:13, 17:13, 17:21, 17:24, 18:6, 18:11, 49:1, 56:18, 56:22, 64:25, 70:25, 80:20, 93:15 <b>station</b> 9:17 <b>ste</b> 3:5 <b>stenographer</b> 9:25 <b>stenographically</b> 114:7 <b>stephen</b> 1:18, 2:1, 4:1, 5:3, 6:16, 7:2, 7:3, 54:12, 55:3, 55:14 <b>steps</b> 22:8 <b>still</b> 41:15, 94:1, 111:14, 111:18 <b>stipulate</b> 6:2, 6:4 <b>stipulations</b> 113:17 <b>stop</b> 109:3 <b>storage</b> 14:11, 14:17, 15:8 <b>store</b> 93:14 <b>stored</b> 14:10, 87:14,	87:19, 87:25, 90:25, 93:10, 94:8 <b>street</b> 3:11 <b>strike</b> 39:12, 58:23 <b>structure</b> 74:12, 74:16, 74:23, 74:25, 75:4, 75:5, 100:2, 102:10, 106:21, 108:24 <b>structures</b> 106:4 <b>studies</b> 22:15 <b>stuff</b> 85:15 <b>subject</b> 63:5 <b>substantial</b> 111:3 <b>such</b> 66:7, 78:22, 90:20, 105:21, 107:15 <b>suggestion</b> 72:14 <b>suite</b> 3:25 <b>sunday</b> 67:16 <b>supervises</b> 40:1 <b>supervision</b> 114:8 <b>supervisor</b> 89:9, 89:21 <b>suppliers</b> 53:2, 80:1, 80:2 <b>supplies</b> 50:25, 52:23 <b>supply</b> 25:22, 27:6, 49:24 <b>support</b> 65:1, 78:1,	84:4, 91:5 <b>suppose</b> 21:2, 47:3, 57:16, 107:25 <b>supposedly</b> 42:3, 44:1, 63:2, 66:10, 72:7, 81:22, 83:23, 88:21, 93:3, 108:2, 108:3 <b>sure</b> 10:4, 13:15, 81:15, 92:15, 108:7, 108:10 <b>suspect</b> 103:17 <b>svp</b> 82:15 <b>swear</b> 5:25 <b>switching</b> 25:22 <b>sworn</b> 4:1, 6:12, 6:14, 6:16 <hr/> <b>T</b> <hr/> <b>taidaily</b> 54:11 <b>tainan</b> 68:14 <b>taipei</b> 1:23, 2:6, 3:18, 5:11, 15:20, 15:21, 15:25 <b>taiwan</b> 1:24, 2:7, 3:19, 9:6, 9:8, 9:9, 9:13, 11:2, 11:5, 15:17, 15:18, 15:21, 15:22, 16:2, 16:5, 16:22, 17:4, 23:16, 34:1, 35:5, 37:14, 37:17,
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USD-0351651



## CONFIDENTIAL - ATTORNEYS' EYES ONLY

Transcript of Stephen Chen

Conducted on July 10, 2018

142

37:18, 54:11, 68:13, 69:7, 70:8, 70:11, 71:2, 75:15, 88:4, 88:8, 88:14, 91:20, 92:24, 93:25, 110:22 <b>taiwanese</b> 60:4 <b>take</b> 6:1, 13:11, 13:12, 25:8, 37:23, 37:24, 44:11, 66:24, 85:14, 85:24 <b>taken</b> 8:5, 22:8, 38:2, 59:7, 85:20, 114:4, 114:7 <b>taking</b> 5:10 <b>talent</b> 71:10, 71:12, 77:6 <b>talents</b> 71:12, 71:17, 72:10 <b>talk</b> 100:12 <b>talked</b> 83:1, 94:21 <b>talking</b> 50:22, 69:14, 94:13 <b>target</b> 34:22 <b>taskforce</b> 69:8, 92:8 <b>team</b> 22:9, 43:3, 69:11, 76:2, 76:3, 76:4, 88:11, 107:16 <b>techinsight</b> 99:22, 100:10, 101:2, 106:9	<b>techinsights</b> 99:25, 100:15, 100:19, 106:1, 106:7, 106:13, 106:15, 106:18, 107:8, 107:9, 107:17 <b>technical</b> 13:22, 14:1, 14:6, 14:15, 14:25, 15:4, 15:9, 41:25, 44:11, 50:15, 68:8, 68:13, 79:1, 83:24, 84:4, 84:9, 88:15, 91:5, 92:25, 93:7, 93:9, 93:14, 96:20, 100:9, 101:2, 101:5, 106:3, 106:8, 107:10 <b>technical-related</b> 92:7 <b>technologies</b> 56:25, 60:16, 62:13, 62:15, 75:1, 75:2, 88:5, 91:13, 93:4, 93:17, 93:19, 93:23, 94:9, 99:16, 100:20, 102:16, 103:18, 109:7 <b>technology</b> 1:4, 3:2, 5:4, 13:23, 14:2, 14:6, 14:15, 15:1, 15:5, 15:10, 16:23, 21:10, 21:25, 22:1, 22:2, 22:7, 22:23, 27:12, 27:14, 28:1, 28:4, 29:10, 29:11, 31:4, 31:11,	37:10, 37:17, 56:18, 56:23, 57:4, 59:13, 59:18, 59:23, 59:24, 60:8, 61:2, 61:5, 62:5, 64:9, 66:3, 68:16, 74:2, 75:23, 75:25, 76:6, 76:12, 76:15, 76:21, 77:22, 79:2, 84:3, 84:24, 85:11, 86:25, 88:11, 91:11, 91:13, 93:20, 93:24, 93:25, 94:8, 95:21, 96:4, 97:6, 97:8, 97:11, 97:13, 97:17, 98:12, 98:20, 98:24, 99:3, 99:4, 99:14, 99:17, 99:19, 100:6, 102:17, 105:20, 109:1, 109:6, 109:9, 111:20 <b>tel</b> 53:6 <b>tell</b> 11:7, 26:15, 60:11, 79:19, 94:11, 99:11, 109:19 <b>telling</b> 86:20, 86:22 <b>term</b> 24:11 <b>terms</b> 85:11, 91:4, 91:13, 92:17, 99:3, 101:10, 102:21 <b>testified</b> 52:7, 59:11, 83:8, 87:20,	99:7, 107:12, 108:20, 110:3 <b>testify</b> 10:23, 48:18, 63:2, 63:4, 63:22, 64:3 <b>testimony</b> 9:5, 9:14, 9:22, 9:24, 10:7, 10:12, 10:14, 11:9, 13:16, 25:10, 63:1, 70:4, 91:23, 109:20, 114:6 <b>testing</b> 23:5, 112:2 <b>texas</b> 16:23, 17:2, 17:3, 17:11 <b>th</b> 1:21, 2:4, 3:11, 5:10, 10:13, 15:13, 114:14 <b>than</b> 8:18, 9:4, 10:12, 16:14, 37:5, 37:23, 53:1, 58:7, 61:12, 70:20, 70:23, 83:7, 104:23, 105:17, 110:4 <b>thank</b> 8:22, 24:17, 24:21, 45:15, 65:19 <b>that's</b> 10:20, 11:12, 17:3, 17:25, 18:1, 18:13, 19:24, 21:17, 22:11, 23:15, 33:4, 34:23, 43:8, 44:19, 51:13, 63:5, 63:24, 64:1,
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PLANET DEPOS

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USD-0351652

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Transcript of Stephen Chen

Conducted on July 10, 2018

143

73:22, 75:23, 80:1, 83:13, 106:22, 106:24 <b>theft</b> 110:23 <b>their</b> 71:13, 78:8, 78:9, 80:18, 84:2, 84:3, 84:5, 84:7, 99:16, 102:14, 102:21, 103:18 <b>them</b> 13:5, 25:16, 50:12, 53:3, 53:15, 61:12, 75:12, 80:17, 81:18, 86:20, 104:7, 104:10, 104:24, 111:3 <b>themselves</b> 5:15, 72:6 <b>then</b> 17:7, 18:12, 19:23, 20:14, 23:23, 28:20, 29:5, 38:24, 39:4, 51:2, 52:21, 52:22, 53:5, 57:17, 59:21, 62:2, 64:11, 69:6, 70:1, 70:21, 71:13, 72:6, 72:17, 75:2, 76:11, 80:9, 83:15, 83:23, 84:13, 85:11, 98:11, 99:1, 99:13, 102:8, 102:10, 108:6, 108:9, 112:23 <b>theoretically</b> 88:16 <b>there</b> 9:11, 10:1, 16:11, 18:16, 25:15, 33:3,	35:7, 39:8, 40:23, 41:18, 42:19, 42:25, 43:3, 43:20, 48:11, 50:15, 50:20, 54:1, 55:23, 56:16, 56:17, 59:20, 59:21, 62:1, 62:12, 66:7, 68:14, 68:21, 69:25, 70:21, 71:4, 75:8, 75:17, 78:1, 78:2, 78:6, 78:7, 78:18, 79:23, 79:25, 80:23, 81:6, 81:7, 82:6, 83:23, 84:15, 84:17, 86:2, 86:10, 86:13, 86:15, 86:20, 86:21, 88:4, 88:21, 99:15, 101:4, 103:15, 103:16, 108:7, 108:22, 109:3, 109:7 <b>there's</b> 46:2, 54:25, 67:14, 67:15, 74:7, 75:22, 76:16, 83:4 <b>thereafter</b> 114:7 <b>therefore</b> 92:13 <b>these</b> 16:18, 18:10, 19:7, 19:9, 49:15, 49:20, 49:23, 50:2, 51:11, 51:12, 63:12, 72:12, 77:17, 78:20, 80:19, 81:3, 84:9, 101:16	<b>thesis</b> 20:23, 21:3 <b>they</b> 5:15, 6:2, 6:6, 19:17, 28:1, 33:10, 63:7, 70:1, 70:22, 71:2, 71:13, 80:11, 80:22, 80:23, 81:7, 81:21, 84:4, 84:10, 88:17, 89:7, 89:19, 92:8, 92:11, 94:23, 95:12, 100:1, 101:18, 101:20, 103:17, 103:23, 104:18, 104:25, 106:11 <b>they're</b> 14:16, 63:15 <b>thing</b> 109:9 <b>things</b> 65:18 <b>think</b> 16:14, 49:19, 63:14, 64:21, 67:12, 70:20, 70:23, 72:18, 75:23, 77:19, 80:17, 83:1, 84:20, 85:1, 85:9, 89:7, 89:19, 95:12, 110:10 <b>thinking</b> 37:18 <b>third</b> 67:19 <b>this</b> 4:3, 5:9, 6:4, 6:17, 9:11, 9:13, 13:3, 13:6, 13:18, 17:18, 21:17, 25:24, 26:8, 27:22, 35:15,	38:6, 42:12, 46:1, 46:7, 46:13, 46:20, 46:21, 48:17, 51:10, 51:17, 52:9, 52:18, 54:7, 58:4, 59:22, 61:3, 63:1, 63:6, 63:10, 65:9, 65:16, 66:25, 67:1, 67:3, 67:19, 67:21, 68:2, 68:8, 69:4, 69:7, 72:5, 72:7, 72:20, 73:9, 73:12, 75:4, 75:20, 76:6, 76:10, 76:11, 76:15, 77:7, 77:8, 78:12, 78:21, 79:7, 79:14, 79:15, 81:8, 82:12, 86:20, 96:22, 97:13, 100:6, 101:23, 104:11, 109:18, 114:11, 114:14 <b>those</b> 16:16, 18:21, 19:2, 42:20, 49:12, 50:17, 51:2, 52:20, 60:18, 70:20, 70:24, 71:15, 73:25, 75:10, 88:17, 92:10, 94:20, 99:5, 101:6, 104:14, 105:1, 108:10, 109:11, 112:10, 112:21, 112:23 <b>thought</b> 90:14, 105:21 <b>three</b> 12:9, 25:3,
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Conducted on July 10, 2018

144

25:4, 49:23, 67:14, 68:16, 68:21, 75:18, 81:16, 83:15, 99:15, 99:21, 100:17, 100:20 <b>through</b> 4:27, 4:31, 4:35, 7:6, 7:15, 7:18, 9:16, 10:1, 10:25, 18:14, 23:22, 26:1, 26:17, 26:21, 27:5, 27:14, 32:20, 34:18, 35:2, 35:6, 36:13, 36:17, 36:21, 36:24, 37:13, 37:15, 38:5, 64:19, 66:20, 66:23, 73:5, 73:7, 79:9, 79:12, 104:22 <b>ti</b> 17:3, 17:5 <b>ti-acer</b> 16:22, 17:6, 23:23, 24:1, 24:23, 25:2, 25:3, 25:7, 25:18, 26:4, 26:13 <b>time</b> 5:6, 9:23, 11:4, 17:14, 17:16, 21:11, 28:13, 28:25, 30:25, 34:2, 34:14, 34:23, 35:20, 35:25, 36:2, 38:1, 38:4, 38:20, 46:13, 46:20, 59:6, 59:9, 61:20, 61:21, 63:20, 68:23, 76:18, 79:17,	82:13, 84:21, 85:19, 85:22, 90:3, 96:18, 96:22, 98:1, 109:19, 109:23, 113:22 <b>timeframe</b> 17:17, 59:18, 59:24, 60:8, 60:11, 60:14, 60:16, 68:8, 68:20, 103:5 <b>timeframes</b> 16:18 <b>times</b> 16:7, 16:12, 16:14, 18:8, 18:9, 95:19 <b>tis</b> 17:2 <b>title</b> 27:1, 27:18, 28:13, 38:9, 38:17, 38:18, 43:25 <b>titled</b> 54:11 <b>today</b> 5:8, 5:12, 11:8, 12:23, 40:18, 41:16, 47:5, 51:3, 73:15, 73:17, 76:22, 102:25, 104:22 <b>today's</b> 5:6, 8:16, 11:6, 11:21 <b>token</b> 84:1, 84:5 <b>too</b> 25:25, 98:25, 103:15, 103:16, 108:25, 109:8 <b>took</b> 25:11, 36:15 <b>tool</b> 52:22, 52:24	<b>tools</b> 58:12 <b>top</b> 49:15, 49:20, 53:2, 56:15, 56:17 <b>topic</b> 21:3 <b>total</b> 16:14, 70:23, 81:25 <b>tours</b> 79:25 <b>tower</b> 1:21, 2:4, 5:10 <b>trade</b> 10:21, 110:23 <b>transaction</b> 33:4, 33:6, 33:8 <b>transcript</b> 6:7, 114:5 <b>transfer</b> 29:10, 31:13, 59:23, 76:21, 88:11, 91:11, 91:13, 97:8, 98:12, 98:20, 98:24, 99:3, 99:4 <b>transferred</b> 18:13, 97:9, 97:20, 111:21 <b>translate</b> 94:2 <b>translation</b> 54:10, 95:5 <b>travel</b> 17:13, 80:20 <b>traveled</b> 48:25 <b>tried</b> 52:19, 103:9 <b>trip</b> 16:10, 16:25, 17:23, 18:1, 18:2, 18:13, 79:16	<b>trips</b> 16:16, 16:18, 17:20, 18:6, 18:11, 18:21, 19:2 <b>true</b> 92:7, 114:5 <b>try</b> 8:12, 26:8, 26:9, 34:14, 35:15, 103:12 <b>trying</b> 63:8 <b>tsinghua</b> 19:23 <b>tsingkeng</b> 20:1 <b>tsun</b> 7:6, 7:18 <b>tuesday</b> 1:26 <b>tunhwa</b> 1:22, 2:5, 3:17, 5:10 <b>turn</b> 45:19, 54:14, 56:16, 67:21, 77:5, 77:10, 79:13, 80:6, 82:11, 85:25 <b>twice</b> 11:23 <b>two</b> 7:10, 12:18, 17:22, 18:9, 23:12, 25:4, 28:19, 36:15, 36:17, 36:19, 40:21, 47:6, 60:16, 60:18, 61:23, 68:15, 68:21, 75:8, 76:18, 80:17, 80:18, 82:1, 84:15, 103:21 <b>two-thousand-and</b> 10:9 <b>type</b> 27:5, 41:22,
---	---	---	--

PLANET DEPOS

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USD-0351654

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Transcript of Stephen Chen

Conducted on July 10, 2018

145

50:24, 99:24 <b>typewriting</b> 114:8 <b>tzou</b> 108:15	63:23, 64:8, 65:14, 69:24, 71:23, 72:1, 85:5, 85:13, 89:5, 89:16, 91:4, 93:16, 94:7, 101:10, 101:20, 106:17 <b>understood</b> 9:1, 16:4, 44:17, 82:10, 83:13 <b>unit</b> 5:2, 22:9 <b>united</b> 1:1, 1:9, 3:21, 5:4, 8:2, 16:6, 16:9, 16:13, 17:13, 17:21, 17:23, 18:6, 18:11, 49:1, 70:25, 80:20, 93:15 <b>university</b> 19:23, 20:1, 20:4 <b>unless</b> 4:3, 6:18, 38:6 <b>unofficially</b> 42:5 <b>until</b> 23:21, 29:2, 31:2, 84:25, 93:11, 97:22, 111:6, 112:11, 112:23 <b>upon</b> 52:8, 102:15 <b>url</b> 95:2, 95:9 <b>urls</b> 95:1 <b>usa</b> 65:7, 77:11, 77:12 <b>usb</b> 14:11, 15:4 <b>use</b> 44:18, 52:16,	52:19, 100:15, 102:20, 102:22, 102:24 <b>used</b> 44:14, 73:12, 87:13, 104:11, 111:19 <b>uses</b> 51:5 <b>using</b> 8:19, 52:24, 53:17, 74:5, 87:9 <b>usually</b> 104:12	25:24, 28:15, 35:13, 45:20, 50:20, 54:19, 75:4, 78:21, 90:19, 104:16, 106:11 <b>veteran</b> 54:12 <b>vice-president</b> 28:22, 29:6, 35:16, 35:19, 38:23, 40:17, 41:9, 41:15, 50:23, 51:4, 83:17 <b>video</b> 5:7, 5:9, 10:2 <b>videographer</b> 3:31, 5:2, 5:8, 5:24, 37:25, 38:3, 59:5, 59:8, 85:18, 85:21, 113:21 <b>videotaped</b> 1:18, 5:3 <b>view</b> 106:20, 109:22 <b>visa</b> 81:21 <b>visibility</b> 92:17 <b>visit</b> 18:20, 19:10, 49:4, 80:1, 81:6 <b>visited</b> 18:23, 50:10, 80:3 <b>visiting</b> 82:7 <b>visits</b> 81:4, 81:11, 81:18 <b>voice-identify</b> 5:14 <b>vp</b> 34:9, 34:10, 38:10, 38:11, 38:13, 38:15,
<b>U</b> <b>ultimately</b> 59:25, 66:8, 75:6 <b>umc's</b> 41:25, 42:11, 78:25, 109:3 <b>umc-jinhua</b> 82:20, 86:11, 86:16, 86:24, 87:4, 110:9 <b>umccorp</b> 73:5 <b>umccorpcjd</b> 4:23, 4:27, 4:31, 4:35, 64:15, 64:22, 66:20, 73:7, 79:9, 79:12 <b>umccorpcjd8</b> 66:23 <b>umi</b> 75:12, 75:14 <b>unable</b> 92:13 <b>unclear</b> 25:24, 28:21 <b>under</b> 57:18, 74:14, 78:25, 114:8 <b>understand</b> 6:3, 8:24, 9:2, 9:3, 13:15, 14:8, 14:12, 32:20, 33:7, 44:15, 52:10, 58:9, 87:24, 89:1, 102:10 <b>understanding</b> 15:18, 52:7, 53:14, 55:7, 55:19, 63:3,	<b>V</b> <b>vague</b> 102:19 <b>various</b> 56:14, 58:6, 62:16, 87:9, 96:3 <b>vendor</b> 48:14, 50:25, 52:23, 53:9 <b>vendors</b> 49:12, 51:5, 51:14, 53:1, 53:2, 53:8, 58:6, 58:7, 58:15, 58:17, 58:19, 81:4, 81:6, 81:12, 81:19 <b>venture</b> 17:3, 17:10, 23:25, 29:22, 30:2, 30:3, 30:7, 30:20 <b>venue</b> 6:4 <b>version</b> 60:20 <b>versus</b> 5:4 <b>very</b> 21:4, 22:20,		

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Transcript of Stephen Chen

Conducted on July 10, 2018

146

38:19, 38:24, 39:4, 39:5, 39:7, 39:12, 39:14, 39:17, 39:19, 39:24, 39:25, 40:4, 40:8, 40:21, 67:23, 84:13, 98:11	44:20, 100:12 <b>we're</b> 14:13, 44:15, 85:1, 107:5 <b>we've</b> 37:22, 44:14, 56:8 <b>wearing</b> 47:6, 84:15 <b>website</b> 89:6, 89:7, 89:17, 94:18, 96:12, 96:16 <b>wednesday</b> 11:25, 12:1, 12:14, 12:20 <b>week</b> 11:23, 12:1, 13:8 <b>well</b> 38:25, 43:20, 48:2, 51:16, 53:21, 63:1, 66:10, 77:8, 87:20, 101:11 <b>wen</b> 43:15 <b>went</b> 26:13, 70:22, 80:22, 81:16, 84:4, 104:24 <b>were</b> 15:16, 16:16, 23:9, 23:20, 25:1, 25:11, 27:3, 28:14, 29:5, 29:9, 30:6, 31:5, 32:16, 32:22, 33:5, 33:13, 33:16, 34:7, 34:16, 35:4, 35:11, 35:20, 38:11, 41:19, 42:20, 42:25, 43:1, 46:8, 50:7, 51:2, 57:3, 59:11,	59:16, 60:7, 60:16, 60:18, 62:1, 62:19, 64:2, 64:10, 68:16, 69:16, 69:25, 70:3, 70:21, 73:21, 75:8, 75:17, 78:19, 79:25, 80:2, 80:23, 81:6, 81:7, 82:5, 82:6, 83:8, 84:4, 84:21, 85:4, 85:8, 86:8, 86:10, 86:22, 87:7, 87:8, 87:12, 87:13, 87:14, 88:4, 88:25, 93:10, 98:10, 98:14, 98:21, 99:8, 99:15, 101:4, 101:16, 101:19, 102:3, 103:2, 103:16, 103:23, 104:8, 104:15, 104:18, 108:22, 109:3, 109:9, 109:11, 112:9 <b>what's</b> 15:12, 38:17, 51:25, 54:5, 61:2, 62:24, 75:13, 101:22 <b>when</b> 8:2, 10:16, 14:8, 22:1, 22:20, 23:21, 31:10, 36:11, 37:3, 37:7, 38:8, 40:8, 41:10, 42:2, 44:10, 44:14, 44:18, 48:11, 50:10, 54:17, 54:23, 63:25, 64:2, 84:3,	84:21, 87:7, 91:12, 92:20, 93:3, 93:22, 94:21, 94:25, 95:10, 97:20, 97:25, 98:4, 98:7, 98:14, 98:21, 99:6, 100:7, 103:7, 110:8, 110:14 <b>where</b> 15:16, 15:19, 18:10, 22:18, 36:9, 36:14, 44:3, 74:6, 74:7, 85:3, 87:18, 89:2, 89:8, 89:11, 89:20, 89:25, 90:20, 92:21, 93:9, 94:11, 94:20, 95:12, 106:17 <b>where's</b> 47:15 <b>whereof</b> 114:13 <b>whether</b> 14:16, 52:4, 99:8, 113:6 <b>which</b> 19:18, 30:7, 39:9, 45:18, 48:14, 51:4, 67:16, 67:18, 68:13, 72:3, 72:19, 75:22, 80:7, 81:3, 82:13, 92:17, 92:23, 99:19 <b>while</b> 18:5, 26:8, 28:13, 31:5, 96:18, 97:6, 98:10, 111:10, 112:5, 112:20 <b>who</b> 7:25, 9:14,
<b>W</b>			
<b>w-a-y-n-e</b> 35:22 <b>w-e-n</b> 43:18 <b>w-e-n-g</b> 43:8 <b>wait</b> 8:10, 8:12 <b>wang</b> 3:33, 6:14, 110:17, 110:22, 111:2, 112:18, 112:21, 112:22, 112:24, 113:2, 113:11 <b>want</b> 11:16, 13:15, 53:3, 59:1, 61:4, 107:7 <b>wanted</b> 37:13, 37:15, 61:5 <b>wasn't</b> 113:6 <b>way</b> 9:25, 10:4, 33:6, 35:15, 42:7, 42:9, 42:24, 51:17, 61:4, 64:4, 108:1 <b>wayne</b> 35:22, 35:23, 35:24, 36:3, 36:9, 83:5, 83:7 <b>we'll</b> 8:19, 34:14,			

PLANET DEPOS

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USD-0351656

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Transcript of Stephen Chen

Conducted on July 10, 2018

147

12:8, 12:14, 16:15, 23:3, 25:21, 29:16, 35:19, 40:8, 40:24, 41:1, 41:9, 43:1, 43:5, 47:7, 50:14, 52:10, 53:23, 57:9, 58:22, 62:1, 62:2, 62:14, 69:6, 69:25, 70:21, 71:4, 71:16, 72:10, 77:24, 78:19, 80:12, 80:25, 81:22, 81:24, 82:4, 82:5, 83:10, 91:25, 92:10, 92:15, 97:16, 103:10, 103:23, 104:10, 104:13, 104:14, 108:12 <b>who's</b> 83:14 <b>whole</b> 16:1, 38:19, 60:3, 60:14, 105:5 <b>whom</b> 5:15, 104:16, 114:3 <b>why</b> 19:20, 21:17, 22:24, 37:11, 60:5, 71:24, 78:12, 85:14, 90:13, 101:8, 103:12 <b>will</b> 6:6, 8:9, 54:6, 55:19, 57:18, 59:21, 79:22, 109:19, 110:1 <b>window</b> 88:8, 91:5, 91:9	<b>wireless</b> 31:21 <b>within</b> 38:12, 60:15, 70:20, 73:22, 76:2, 103:22 <b>without</b> 101:3 <b>witness</b> 5:25, 9:13, 10:16, 10:22, 45:5, 48:18, 51:21, 113:6, 114:13 <b>witness's</b> 49:19, 78:5, 88:7, 89:14, 89:15, 92:6, 94:17, 109:20 <b>wong</b> 3:31, 5:8 <b>word</b> 24:15 <b>work</b> 10:15, 10:16, 16:22, 22:21, 23:3, 28:3, 44:22, 52:8, 55:22, 75:7, 76:17, 97:3, 97:25, 98:5, 98:9, 98:22, 104:1, 104:3, 104:9, 104:13, 104:16, 104:17, 105:3, 111:22 <b>worked</b> 17:9, 18:5, 22:20, 25:3, 28:25, 31:1, 37:3, 44:3, 54:18, 61:25, 75:18, 91:14, 98:4 <b>working</b> 54:23, 71:14, 76:23, 88:24, 97:7, 98:7,	98:15, 110:8, 110:15 <b>works</b> 76:19 <b>world</b> 87:13 <b>would</b> 5:14, 5:24, 6:2, 8:23, 19:6, 21:21, 30:21, 46:20, 55:13, 55:14, 65:5, 68:14, 68:21, 69:6, 72:9, 76:19, 83:25, 87:24, 89:1, 89:7, 89:19, 89:24, 90:9, 90:19, 90:21, 92:8, 92:9, 92:10, 92:11, 92:12, 93:1, 94:16, 94:17, 102:10, 102:21, 103:11, 103:15, 103:17, 104:3, 109:8, 113:8 <b>wu</b> 67:23, 68:1, 81:24 <b>wuhan</b> 72:23 <hr/> <b>X</b> <hr/> <b>x-i-e</b> 41:7 <b>x-m-c</b> 72:22 <b>x-u</b> 41:13 <b>xie</b> 41:5 <b>xmc</b> 72:20, 72:23 <b>xu</b> 41:11, 41:13, 41:15 <hr/> <b>Y</b> <hr/> <b>y-u-e-f-o-n-g</b> 26:24	<b>yeah</b> 10:6, 11:4, 11:12, 12:3, 16:1, 16:19, 16:24, 19:5, 21:14, 21:16, 22:23, 23:15, 23:24, 24:1, 25:6, 25:25, 37:24, 104:22 <b>year</b> 7:10, 15:14, 19:25, 20:3, 20:18, 25:4, 51:10, 69:13, 110:24 <b>year-end</b> 76:7 <b>yearly</b> 19:4 <b>years</b> 17:22, 19:6, 22:12, 22:21, 23:9, 23:12, 25:1, 25:3, 28:19, 28:23, 54:22, 54:23, 60:15, 61:23, 65:6, 68:15, 68:21, 76:18 <b>yep</b> 63:21 <b>yesterday</b> 113:18, 113:19 <b>yet</b> 55:23 <b>yield</b> 34:20, 34:22, 98:13 <b>you're</b> 18:2, 18:18, 19:13, 19:16, 22:18, 34:25, 52:2, 56:2, 69:13, 81:1, 87:20, 94:25, 95:21, 105:7, 106:25, 111:16,
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PLANET DEPOS

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USD-0351657



## CONFIDENTIAL - ATTORNEYS' EYES ONLY

Transcript of Stephen Chen

Conducted on July 10, 2018

148

113:7 <b>you've</b> 11:7, 17:19, 17:23, 67:1, 90:23, 96:18, 110:3, 113:1 <b>your</b> 6:22, 7:1, 7:5, 7:11, 7:25, 8:5, 8:11, 11:13, 11:17, 11:18, 12:22, 13:16, 13:21, 13:25, 14:4, 14:13, 14:24, 15:3, 15:7, 15:12, 16:4, 16:15, 17:14, 17:24, 19:21, 20:6, 20:15, 20:18, 20:20, 20:23, 21:3, 21:21, 22:13, 22:17, 22:24, 22:25, 23:1, 24:23, 25:7, 25:18, 26:9, 26:15, 27:1, 27:10, 27:18, 28:6, 28:10, 28:13, 29:19, 32:21, 34:5, 34:7, 34:16, 36:19, 37:10, 38:9, 38:17, 38:21, 46:25, 47:7, 47:23, 48:8, 51:16, 54:25, 55:7, 55:19, 57:13, 62:7, 64:8, 66:3, 69:22, 70:4, 70:6, 70:24, 71:3, 71:23, 74:1, 74:9, 80:6, 84:21, 88:24, 90:3, 90:15, 93:13,	94:7, 96:2, 96:18, 102:15, 102:17, 105:3, 105:20, 106:2, 107:1, 108:16, 109:11, 109:20, 110:19 <b>yourself</b> 11:8, 66:25 <b>yu</b> 64:23 <b>yuefong</b> 26:22 <b>yugo</b> 3:33, 6:14 . <b>.105</b> 4:39 <b>.45</b> 4:8 <b>.54</b> 4:12 <b>.56</b> 4:16 <b>.6</b> 4:1, 4:6 <b>.64</b> 4:21 <b>.66</b> 4:25 <b>.73</b> 4:29 <b>.79</b> 4:33 <b>.97</b> 4:37 0 <b>00</b> 82:14 <b>000001</b> 4:23, 64:15 <b>000008</b> 4:27, 66:20 <b>000017</b> 4:31, 73:7 <b>000041</b> 4:35, 79:9	<b>001</b> 64:21 <b>01</b> 64:22 <b>06</b> 38:1 <b>06932</b> 1:7 <b>07</b> 1:27, 5:7 <b>09</b> 59:6 <hr/> <b>1</b> <b>1</b> 1:12, 113:22, 113:23 <b>10</b> 1:12, 1:26, 5:6, 16:14, 16:16, 28:5, 28:22, 38:1, 38:4, 49:15, 49:20, 53:1, 53:2, 54:22, 54:23, 58:7, 65:6, 80:15, 104:23 <b>100</b> 69:16 <b>105</b> 1:23, 2:6 <b>106</b> 3:18 <b>11</b> 59:6, 59:9, 80:15 <b>110</b> 84:22, 85:3, 85:7, 93:8, 93:10, 93:12 <b>114</b> 1:32 <b>12</b> 1:21, 2:4, 4:27, 5:10, 15:13, 66:20, 66:23, 80:8,	80:15, 80:19, 85:1, 85:19, 85:22 <b>120</b> 69:15 <b>13</b> 56:19, 56:24, 57:14 <b>14</b> 10:8, 10:9, 10:13 <b>15</b> 114:14 <b>150</b> 69:3, 69:10 <b>1500</b> 3:5 <b>16</b> 35:3, 35:5, 35:11, 37:3, 37:4, 56:17 <b>17</b> 1:7, 10:10, 73:5 <b>18</b> 38:4 <b>19</b> 16:24 <b>1962</b> 15:15 <b>1985</b> 20:5 <b>1987</b> 20:19 <b>1989</b> 16:24, 17:17, 23:11, 23:15, 23:21 <b>1990</b> 23:22, 23:23 <b>1991</b> 17:17, 23:24, 25:5 <b>1994</b> 25:5 <b>1996</b> 29:2, 98:8 <b>1x</b> 31:12, 31:17,
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Transcript of Stephen Chen

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149

31:22	48:25, 50:7,	79:6, 79:8,	<b>4</b>
<b>2</b>	50:10, 56:19,	81:10, 85:25	<b>4</b>
<b>2,000</b>	56:24, 57:14,	<b>2x</b>	19:17, 82:14,
65:2, 65:16	60:3, 61:24,	101:21, 101:23,	83:15, 83:16
<b>20</b>	62:6, 62:18,	102:5	<b>400</b>
22:11, 31:12,	63:17, 64:3,	<b>2z</b>	3:25
32:2, 32:7,	64:8, 64:23,	101:21, 101:24,	<b>41</b>
56:17, 61:12,	68:23, 69:15,	102:5	79:12
65:6, 70:20,	70:18, 71:25,	<b>3</b>	<b>42</b>
70:21, 70:23,	73:3, 75:15,	<b>3</b>	85:19
70:24, 71:15,	76:18, 79:17,	82:14	<b>44</b>
104:23, 105:17,	80:20, 103:5	<b>3-0</b>	79:15, 79:20
110:4	<b>2017</b>	77:2	<b>45</b>
<b>200</b>	10:13, 44:23,	<b>3-7-0</b>	81:11, 82:14,
69:3	45:2, 45:13,	77:3, 105:10	83:15
<b>2000</b>	47:1, 47:2,	<b>30</b>	<b>46</b>
42:18	47:4, 47:11,	4:25, 4:31,	4:35, 79:9,
<b>2006</b>	47:12, 55:8	66:18, 66:19,	79:12, 82:11,
29:21, 30:6,	<b>2018</b>	73:5, 73:7,	86:1
31:2, 31:8, 31:9	1:26, 5:6,	77:10, 85:1,	<b>4655</b>
<b>2007</b>	55:14, 76:7,	101:19	3:5
10:17	76:19, 114:14	<b>300</b>	<b>5</b>
<b>2008</b>	<b>205</b>	68:14, 68:18,	<b>50</b>
29:2	1:22, 2:5, 5:10	68:21, 68:25,	30:23, 83:16,
<b>2009</b>	<b>21</b>	69:8	85:22
29:2	67:15, 101:24	<b>31</b>	<b>55</b>
<b>2013</b>	<b>22</b>	4:8, 45:18,	113:22, 113:23
31:2, 31:3,	67:16	45:21	<b>555</b>
31:10, 31:24,	<b>23</b>	<b>32</b>	3:11
32:2, 32:5,	4:21, 64:13,	4:12, 54:2,	<b>7</b>
32:9, 32:13,	64:14, 64:20,	54:6, 60:20,	<b>7-0</b>
32:23, 32:25,	67:16, 74:8,	60:21, 60:23,	31:7
97:21, 97:22	74:11, 74:14	60:24, 61:1,	<b>70</b>
<b>2014</b>	<b>25</b>	61:2, 61:7,	31:6, 31:8,
19:8	31:12, 31:16,	61:22	97:9
<b>2015</b>	31:24, 32:10,	<b>321</b>	<b>8</b>
19:8, 36:12,	61:7, 75:22,	3:25	<b>8-2</b>
37:1, 37:7,	75:25, 91:12,	<b>33</b>	7:6
37:20, 38:8,	97:9, 97:20,	4:16, 56:5,	<b>89</b>
40:9, 41:10,	101:24	56:8	16:24
42:24, 44:10,	<b>250</b>	<b>350</b>	<b>8f</b>
99:7, 110:11	69:8	68:22, 68:25	3:17
<b>2016</b>	<b>26</b>	<b>370</b>	<b>9</b>
18:3, 42:4,	3:11	77:1, 105:8,	1:27, 5:7
42:6, 42:13,	<b>28</b>	105:10, 105:12	
42:17, 42:18,	59:9, 77:5,	<b>3:-cv--jsw</b>	
42:22, 42:24,	101:24	1:7	
	<b>29</b>		
	4:33, 73:5,		

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